

San Francisco Planning Department

Bryant Square

Draft Environmental Impact Report

Summary of Comments and Responses

98.635E

February 28, 2000

Draft EIR Publication Date:
November 20, 1999

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January 6, 1999

Draft EIR Public Comment Period:
Nov. 20, 1999 to Jan. 6, 2000

Scheduled EIR Certification Date:
March 9, 2000

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TABLE OF CONTENTS)

<u>Section</u>	<u>Page</u>
2.0 COMMENTERS	2-1
2.1 Persons and Organizations Commenting in Writing	2-1
2.2 Persons Providing Public Testimony	2-3
3.0 COMMENTS	3-1
3.1 Introduction	3-1
3.2 Comment and Response Guide	3-1
3.3 Written Comments	3-14
3.4 Public Hearing Transcript	
4.0 RESPONSE TO COMMENTS	4-1
4.1 Introduction to Responses	4-1
4.2 Response to Comments	4-4
5.0 TEXT CHANGES TO THE DRAFT EIR	5-1
5.1 Introduction	5-1
5.2 Addenda to the Draft EIR	5-1

List of Tables

TABLE C&R.1	Parking Code Requirements and Demand	4-33
TABLE C&R.2	Parking Supply Surplus/Shortfall	4-34

List of Figures

FIGURE 2	Existing Buildings	5-6
FIGURE 3	Site Plan	5-7
FIGURE C&R.1	View and Revised Simulation from Corner of York Street and 19th Street	5-12

1.0 SUMMARY

This document contains the public comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed Bryant Square project and responses to those comments.

All substantive verbal comments made at the Draft EIR public hearing before the City Planning Commission on January 6, 2000, and all written comments received during the public review period from November 20 to January 6, 2000, are included herein in their entirety.

Chapter 2.0 contains a list of all persons and organizations who submitted written comments on the Draft EIR and of all commenters who spoke at the public hearing held on December 16, 1999.

Chapter 3.0 presents a comment and response guide which lists each letter or public hearing comment, the specific topics contained therein to each comment, and then a guide to which response in Chapter 4.0 responds to the comment. This is followed by all written comments received during the public comment period, and the verbatim transcript of the January 6, 2000 public hearing before the City Planning Commission.

Chapter 4.0 presents a list of responses by topic, the page number where each response is found, and all of the responses to comments.

Chapter 5.0 of this document presents a consolidated set of the text changes to the Draft EIR reflecting additional corrections resulting from public comments or responses to comments, or initiated by the City and County of San Francisco to correct or expand upon the Draft EIR text. Where a text change is made as part of a response to a public comment, the response number is noted. (In such cases, the text change may also be found within the response to comment.) In addition, all graphics for this document are included in Section 5.1.

These comments and responses will be incorporated into the Final EIR as a new chapter. Revisions resulting from comments and responses will be incorporated into the Final EIR, as indicated in the responses.

2.1 PERSONS AND ORGANIZATIONS COMMENTING IN WRITING

The following people and organizations submitted written letters/comments which were received during the public comment period from November 20, 1999 to January 6, 2000. The letter number corresponds to the number as coded on each letter in Section 3.0.

Letter 1 –	Anthony Kleppe
Letter 2 –	Robert C. MacPhee
Letter 3 –	Charlene Aparicio
Letter 4 –	Belinda Griswold
Letter 5 –	J. Richard Osborn
Letter 6 –	Peter Van Dine
Letter 7 –	David Hecht
Letter 8 –	Karen Scott
Letter 9 –	Regis Paul Marcelin
Letter 10 –	T.L. Wetzel
Letter 11 –	Adrian Harris
Letter 12 –	Jack M. Bethards
Letter 13 –	Corinne Fendell
Letter 14 –	Sylvia Ramirez
Letter 15 –	Sarah E. Steinberg
Letter 16 –	Paul and Sylvia Pera
Letter 17 –	Medeia Maquis and Robert Garcia
Letter 18 –	David Maltz
Letter 19 –	James Hall
Letter 20 –	Christina M. Friedrich
Letter 21 –	Joseph J. Wehrer
Letter 22 –	Jeremy Hermann
Letter 23 –	Tania Ferguson

Letter 24 –	Cliff
Letter 25 –	Miguel Nelson
Letter 26 –	Leigh Jordan, Coordinator, California Historical Resources Information System
Letter 27 –	John Reamer
Letter 28 –	Millie Chu
Letter 29 –	Kim Nies
Letter 30 –	Katherine E. Shlaudeman
Letter 31 –	Peter Sutherland
Letter 32 –	Mary Bennett
Letter 33 –	Mary Bobbit
Letter 34 –	Alan Lyons
Letter 35 –	Jul Niemier
Letter 36 –	Richard Thompson
Letter 37 –	Jessie Francisco
Letter 38 –	Jane Gere
Letter 39 –	Si Bunting
Letter 40 –	Bruce Zeuli
Letter 41 –	Gordon Shiozaki
Letter 42 –	Donald Parrillo
Letter 43 –	Stanley Ho
Letter 44 –	Liz Gazzano
Letter 45 –	James Kussow and Merle Wilson, Jr.
Letter 46 –	Tom Scott
Letter 47 –	Kathy Scott
Letter 48 –	Tim Mangan
Letter 49 –	Tom Wetzel
Letter 50 –	David Jayne and Kay Hoskins
Letter 51 –	Joshua Cohen
Letter 52 –	Davina Smith
Letter 53 –	Steve Hovland
Letter 54 –	Cary R. Boisvert
Letter 55 –	Resident, 3119 20 th Street
Letter 56 –	Marcia Stuermer
Letter 57 –	Simone Eastwood
Letter 58 –	Antje Kann

2.2 PERSONS PROVIDING PUBLIC TESTIMONY

The public hearing on comments to the Draft EIR was held in front of the Planning Commission on January 6, 2000. Commissioners Anita Theoharis (President), Dennis A. Antenore, Hector J. Chincilla, Linda Richardson, and Larry Martin were in attendance. The following people made oral comments about the Draft EIR at the public hearing.

Corinne Fendell

Jul Niemier

Peter Sutherland

Lichen

Steve Hovland

Tom Wetzel

Paul Lent

Batel Tibes

David Maltz

Gisele Paris

Joshua Cohen

Jonathan Youtt

James P. Corcoran

Teri Matelson

Mary Bennett

David Jayne

Kay Hoskins

Andy Hope

Simone Eastwood

Sue Hestor

Jake Fielder

Commissioner Linda Richardson

Commissioner Dennis Antenore

Gerald Green, Planning Director

.

3.1 INTRODUCTION

This section includes all of the written comments and the transcript of the public hearing. The transcript is a verbatim transcription of the public hearing on the Draft EIR which was conducted by the Planning Commission on January 6, 2000. Comments on the EIR are indicated by a vertical line in the right margin of the letter or of the transcript.

Each letter is numbered. The table below includes an outline of the comments in the order provided in Section 2.0 Commenters, by each writer or speaker. In the column called Topic is a brief topic description for each comment. In the column called Response Number is the alphanumeric code where the response is included in Section 4.0 Responses to Comments. The comment letters, as well as the public hearing transcript, follow the Comment and Response Guide, below.

3.2 COMMENT AND RESPONSE GUIDE

Letter	Topic	Response No.
Letter 1	a Building size; shadows	5d, 5e
	b Parking supply/demand; project approval process; parking variance; building size	7a, 2a, 2b, 5d
	c Project approval process	2a
Letter 2	a EIR adequacy	3a
	b Land use	4f
	c Building size; property values	5d, 11a
	d Views	5c
	e Intersection conditions; parking meters	7l, 7b
	f Valet parking requirement; parking supply/demand; parking congestion; quality of life	2c, 7a, 7c, 15
	a	
	b Intersection conditions; visitor and delivery parking; transit commute	7l, 7c, 7o

Letter		Topic	Response No.
Letter 2	h	Project trip generation	7j
	i	Land use	4f
	j	Garage entrance impacts	7n
	k	Project approval process; valet parking requirement	2a, 2c
	l	Valet parking impacts	2c
	m	Parking meters	7b
	n	Construction impacts	8
	o	Alternatives: Reduced Height	20a
	p	EIR adequacy; land use; parking congestion; traffic congestion; building size; views	3a, 4f, 7c, 7m, 5d, 5c
Letter 3	a	Building size; visual quality	5d, 5a
	b	Project description	1a
	c	Noise impacts; traffic congestion	13, 7m
	d	Visual quality, project approval process	5a, 2a
Letter 4	a	Mitigation measures; height/bulk/FAR; business displacement	18, 4c, 10b
Letter 5	a	Building height; building size	4d, 5d
	b	<i>General Plan</i> ; building height; building bulk	2e, 4d, 4e
	c	Shadows; <i>Proposition M</i>	5e, 2f
	d	Alternatives: Reduced Height	20a
	e	Open space	4e
	f	FAR	4c
	g	Parking variance; parking supply/demand; parking congestion; significant parking effects	2b, 7a, 7c, 19a
	h	Building height; building bulk	4d, 4e
	i	Alternatives: Reduced Height	20a
	j	Project plans	1b
	k	Project description	1a
	l	Parking supply/demand; parking congestion	7a, 7c
	m	Project Description	1a
	n	Building height; building bulk	4d, 4e
	o	Visual quality; shadows; Alternatives: Reduced Height	5a, 5e, 20a

Letter		Topic	Response No.
Letter 5	p	Alternatives: Reduced Height	20a
	q	Open space	4e
	r	FAR	4c
	s	Project approval process	2a
	t	Alternatives: Reduced Height	20a
	u	Project plans	1b
	v	Project description; parking congestion	1a, 7c
	w	Parking congestion	7c
	x	Project description	1a
Letter 6	a	Employee densities; parking supply/demand	10c, 7a
	b	Project approval process	2a
	c	Traffic mode split; transit service	7k, 7p
	d	Traffic congestion	7m
	e	Cumulative development	17a
	f	Visual quality	5a
	g	Project approval process	2a
Letter 7	a	Project approval process	2a
Letter 8	a	Project approval process	2a
Letter 9	a	The Mill Building	6b
	b	The Mill Building; visual quality; visual simulations	6b, 5a, 5b
	c	2101 Bryant Street	6a
	d	Alternatives: Reduced Height	20a
	e	Existing vacancies	10a
	f	Alternatives: Industrial; project sponsor's objectives	20b, 1c
	g	Transit service	7p
	h	Project plans	1b
	i	Shadows	5e
	j	Parking congestion	7c
Letter 10	a	Project approval process	2a

Letter	Topic	Response No.	
b	Transit first policy; pedestrian analysis; cumulative development; Alternatives: Reduced Parking	7q, 10r, 17a, 20d	
c	Pedestrian analysis	7r	
d	Business displacement	10b	
Letter 11	a	Project approval process	2a
Letter 12	a	Quality of life; visual quality; 2101 Bryant Street; Mill Bldg.	15, 5a, 6a, 6b
	b	Project approval process; parking congestion	2a, 7c
Letter 13	a	Land use	4f
	b	Project approval process; building height; parking congestion	2a, 4d, 7c
Letter 14	a	Project approval process; parking congestion	2a, 7c
	b	Building size; land use	5d, 4f
	c	Parking congestion	7c
	d	Project approval process	2a
Letter 15	a	Project approval process	2a
Letter 16	a	Project approval process	2a
	b	Pedestrian analysis; parking congestion; traffic congestion	7r, 7c, 7m
	c	Shadows	5e
	d	Project size; 2101 Bryant Street	5d, 6a
	e	Parking variance; parking supply/demand	2b, 7a
Letter 17	a	Project approval process; parking congestion	2a, 7c
Letter 18	a	EIR adequacy	3a
	b	Visual quality	5a
	c	Parking variance; parking supply/demand	2b, 7a
	d	Building size; shadows; property values; project approval process	5d, 5e, 11a, 2a
	e	EIR process	3b
	f	Alternatives: Reduced Height	20a
Letter 19	a	Project approval process	2a
Letter 20	a	Building size; visual quality	5d, 5a

Letter	Topic	Response No.
b	Views; shadows; property values	5c, 5e, 11a
c	Parking congestion	7c
d	Project approval process	2a
Letter 21	a Project approval process; building size; visual quality	2a, 5d, 5a
b	Parking congestion	7c
Letter 22	a Project approval process	2a
b	Parking variance; parking supply/demand	2b, 7a
c	Views; shadows	5c, 5e
d	Employment; visual quality; parking congestion	10d, 5a, 7c
Letter 23	a Building size; views	5d, 5c
b	Parking variance; parking supply/demand	2b, 7a
c	Project approval process; visual quality	2a, 5a
Letter 24	a Project approval process	2a
b	Shadows	5e
c	Project description	1a
Letter 25	a Building size; building height, building bulk	5d, 4d, 4e
b	Visual quality; the Mill Building; views; shadows	5a, 6b, 5c, 5e
c	Parking congestion	7c
d	Project approval process	2a
Letter 26	a 2101 Bryant Street	6a
Letter 27	a Visual quality; the Mill Building	5a, 27a
Letter 28	a Building size	5d
b	Visual quality	5a
c	Parking congestion; on-street parking	7c
Letter 29	a Parking variance; parking supply/demand	2b, 7a
b	Visual quality; views; shadows	5a, 5c, 5e
c	Project approval process; height/bulk/FAR; parking variance	2a, 4c, 2b
Letter 30	a Parking congestion	7c
b	Height/ bulk/FAR; visual quality	4c, 5a

Letter	Topic	Response No.
c	Views	5c
d	Cumulative development	17a
e	Transit service	7p
f	Traffic congestion; pedestrian analysis	7m, 7r
g	2101 Bryant Street	6a
h	Construction impacts	8
i	Building size; building bulk; visual quality	5d, 4e, 5a
j	Project approval process	2a
Letter 31	a Cumulative development	17a
	b Parking congestion; cumulative development	7c 17a
	c Land use	4f
	d <i>General Plan</i> ; building size; project approval process	2f, 5d 2a
	e Views	5c
	f Land use; cumulative development	4f, 17a
	g Height/bulk/FAR; project sponsor's objectives	4c, 1c
	h Construction impacts	8
	i Geotechnical impacts	12
	j Intersection conditions; traffic congestion; EIR adequacy	7l, 7m, 3a
	k Transit service; cumulative development	7p, 17a
	l Land use	4f
	m Business displacement	10b
	n Project approval process	2a
	o Cumulative development	17a
	p Project approval process	2a
Letter 32	a Building size; height/bulk/FAR	5d, 4c
	b Parking supply/demand	7a
	c Project approval process; building bulk; parking variance	2a, 4e, 2b
Letter 33	a Building height; building bulk	4d, 4e
Letter 34	a EIR process	3b
	b Project approval process; building size; visual quality	2a, 5d, 5a
	c Growth inducement	9

Letter	Topic	Response No.
d	EIR adequacy; EIR process	3a, 3b
e	Project approval process; parking variance	2a, 2b
f	Business displacement	10b
g	Zoning; housing	4a
h	Neighborhood economic impacts	11b
i	Building size, visual quality; height/bulk/FAR	5d, 5a, 4c
j	Views; visual simulations	5c, 5b
k	Visual quality; 2101 Bryant Street	5a, 6a
l	Open space	4e
m	Alternatives: Design	20c
n	The Mill Building	6b
o	EIR adequacy; Alternatives: Design; The Mill Building; open space	3a, 20c, 6b, 4e
p	Mitigation measures; traffic congestion	18, 7m
q	Parking variance; valet parking requirement; parking supply/demand; parking meters	2b, 2c, 7a, 7b
r	Traffic methodology	7i
s	Mitigation measures; transit service	18, 7p
t	Project sponsor's objectives	1c
u	Off-site alternatives	20e
v	Project approval process	2a
Letter 35	a Project approval process; zoning; building bulk; parking variance	2a, 4a, 4e, 2b
Letter 36	a Parking variance; parking supply/demand	2b, 7a
	b Building size	5d
	c Visual quality	5a
	d Project approval process	2a
Letter 37	a Parking congestion; parking variance	7c, 2b
	b Parking congestion	7c
	c Project approval process	2a
Letter 38	a Parking congestion; parking variance	7c, 2b

Letter	Topic	Response No.	
b	Parking congestion	7c	
c	Project approval process	2a	
Letter 39	a	Parking congestion; parking variance	7c, 2b
	b	Parking congestion	7c
	c	Project approval process	2a
Letter 40	a	Parking congestion; parking variance	7c, 2b
	b	Parking congestion	7c
	c	Project approval process	2a
Letter 41	a	Parking congestion; parking variance	7c, 2b
	b	Parking congestion	7c
	c	Project approval process	2a
Letter 42	a	Parking congestion; parking variance	7c, 2b
	b	Parking congestion	7c
	c	Project approval process	2a
Letter 43	a	Parking congestion; parking variance	7c, 2b
	b	Parking congestion	7c
	c	Project approval process	2a
Letter 44	a	Project approval process	2a
	b	Parking congestion; building size	7c, 5d
	c	Shadows	5e
Letter 45	a	Project approval process	2a
	b	Land use	4f
	c	Building size; shadow; quality of life	5d, 5e, 15
	d	Project trip generation; parking congestion; traffic congestion	7j, 7c, 7m
	e	Fire safety	14
	f	Parking variance	2b
	g	Severe environmental damage	19b
	h	Project approval process; Alternatives: Reduced Height	2a, 20a
Letter 46	a	Building size; visual quality	5d, 5a
	b	Parking variance	2b

Letter	Topic	Response No.
c	Project approval process	2a
Letter 47	a b c	5a, 5d, 2b 2a
Letter 48	a b c d f g h i j	17a 7a, 7b, 7c, 18 5a, 6b 7h 7l 7f 7s 7l, 7m, 7r 2b, 7c, 7d, 20a
Letter 49	a b c d e f g	5a, 10d 7q 7, 17a 20d 7r 10d, 10b 20b
Letter 50	a b c d	2a 5a 5e, 5c, 7c 10d, 10b
Letter 51	a b c	3a 10b, 4f 5d, 5a

Letter	Topic	Response No.
d	EIR adequacy	3a
e	2101 Bryant Street	6a
f	Project trip generation	7j
g	Traffic counts; cumulative development	7h, 17a
h	Employment	10d
Letter 52	a Project approval process	2a
	b Parking congestion; freight loading; visitor/delivery parking	7a, 7s, 7e
	c Land use	4f
	d Business displacement	10b
	e Project approval process	2a
Letter 53	a Project approval process; views; property values	2a, 5c, 11a
	b Parking supply/demand	7a
	c Visual quality; building size	5a, 5d
Letter 54	a Project approval process; visual quality; parking supply/demand; traffic congestion; cumulative development	2a, 5a, 7a, 7m, 17a
Letter 55	a Parking supply/demand	7a
	b Project approval process	2a
Letter 56	a Visual quality; building size; land use	5a, 5d, 4f
	b Parking variance	2b
	c Project approval process	2a
Letter 57	a Project approval process; visual quality; views; shadows	2a, 5a, 5c, 5e
Letter 58	a Shadows; views; land use	5e, 5c, 4f
	b Alternatives: Reduced Height	20a
	c Shadows; views; property values; project approval process	5e, 5c, 11a, 2a
	d Parking congestion; parking variance; valet parking require.	7b, 2b, 7c
	e Visual quality; building size	5a, 5d
	f The Mill Building	6b
	g 2101 Bryant Street; traffic congestion; land use	6a, 7m, 4f
	h Visual quality	5a

Public Hearing	Topic	Response No.
1	Transit first policy	7q
2	Cumulative development; Alternatives: Reduced Parking	17a, 20d
3	Pedestrian analysis; <i>Proposition M</i>	7r, 2f
4	Parking congestion	7c
5	Cumulative development; cumulative local air quality; parking congestion	17a, 17b, 7c
6	Land use	4f
7	Parking congestion	7c
8	Project approval process	2a
9	Cumulative development	17a
10	Visual quality; building size	5a, 5d
11	Building size; project approval process; EIR adequacy	5d, 2a
12	Transit service; cumulative development	7p, 17a
13	Construction impacts	8
14	Parking congestion	7c
15	Height/bulk/FAR; visual quality	4c, 5a
16	Visual quality	5a
17	Disabled parking	7g
18	Transit service	7p
19	Parking congestion	7c
20	Visual quality	5a
21	Child-care	2d
22	Building height; parking congestion; visual quality	4d, 7c, 5a
23	Visual quality	5a
24	Construction impacts	8
25	Mitigation measures	18
26	Building size	5d
27	Project description	1a
28	Mitigation measures; construction impacts; building size	18, 8, 5d
29	Parking congestion	7c
30	Construction impacts	8
31	Visual quality; shadow	5a, 5e

Public Hearing	Topic	Response No.
32	Visual quality	5a
33	Traffic congestion	7m
34	Shadows	5e
35	EIR adequacy	3a, 2a
36	Project approval process	2a
37	Cumulative development; neighborhood economic impacts; project approval process; parking congestion	17a, 11b, 2a, 7c
38	Project approval process; quality of life	2a, 15
39	Visual quality	5a
40	Visual quality	5a
41	The Mill Building	6b
42	Shadows	5e
43	Building size	5d
44	Construction impacts	8
45	Parking congestion	7c
46	Building size	5d
47	Parking demand/supply; parking congestion	7a, 7c
48	Project approval process	2a
49	Parking congestion	7c
50	Project approval process	2a
51	Visual quality; shadows; parking congestion	5a, 5e, 7c
52	Project Description	1a
53	Project approval process	2a
54	EIR process	3b
55	Visual quality; shadows	5a, 5e
56	Existing vacancies; business displacement	10a, 10b
57	Land use	4f
58	Project description	1a
59	Project plans	1b
60	Project sponsor's objectives	1c
61	Land use	4f
62	<i>Proposition M</i>	2f

Public Hearing	Topic	Response No.
63	Zoning: housing	4a
64	Land use	4f
65	Business displacement	10b
66	Rental housing	4d
67	Cumulative development; cumulative local air quality	17a, 17b
68	Community controversy	16
69	Construction impacts	8
70	Mitigation measures	18
71	Cumulative development	17a
72	Visual quality	5a
73	Shadows	5e
74	Zoning history	4b

Anthony Kleppe
2624 Bryant Street
San Francisco, CA 94110
(415)824-7613

January 6, 2000

City and County of San Francisco
Planning Committee
1600 Mission Street
San Francisco, CA 94103

RE: Bryant Square Development

Dear Commission Members:

I am writing to add my voice to those in opposition of the development of the Bryant Square project.

This area of Bryant Street is primarily residential with some very beautiful examples of Victorian architecture. One of the most beautiful qualities of existing structures in the area is their human scale. While seeming large and spacious these are buildings that are approachable. The addition of a 65 foot modern building would be a crime. While most of the surrounding buildings are three stories or less this five story Goliath would tower over all the existing buildings, in no way adding to the charm, character, or ascetics of the neighborhood. The final insult is the way this building would block the sun for blocks around.

5d
5e

As to the requested variance for parking, this building will offer no relief to a neighborhood with worsening parking problem. I can see the tenants of this development utilizing all existing street parking for five of six blocks in all directions. This is simply too large a development for this neighborhood.

7a
2a
2b

Please, as a resident of this beautiful neighborhood, a home owner, and most importantly as the father of a beautiful 2 year old boy (who will have to live with the decisions made by this board), I ask the Planning Commission to reject the development, and not provide the developer with their requests for variance for the Bryant Square development. This is a development the City and County of San Francisco does not need.

5d
2a

Sincerely,


Anthony Kleppe
Property Owner

MacPhee & Associates
P.O. Box 411567
San Francisco, CA 94141-1567
(415) 550-6907 (fax)
(415) 695-9800 (office)
rcmacphee@aol.com

January 5, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

RE: Draft Environmental Impact Report 98.635E
Bryant Square Project

Dear Ms. Gitelman:

I live across the street from the proposed "Bryant Square" project and wish to register my concerns about the development and the proposed Environment Impact Report. I have read the Draft EIR and believe that it does not adequately analyze the significant impact of this large project on my neighborhood. I will be out of the country on the day of the hearing so I am sending this letter to register my concerns and comments.

3a

The DEI report concludes on page 1-6 that, "In summary, the project would not result in any significant transportation effects that could not be mitigated if the project was implemented". That conclusion is inaccurate.

The project as contemplated will dramatically and negatively change the entire character of the neighborhood. Currently, my neighborhood is primarily residential with a mix of small businesses such as multimedia and light industry. If the Bryant Square project is developed, the neighborhood will be fundamentally changed to an office district with some residential uses, essentially dwarfing the neighborhood and it's current eclectic mix of uses.

4f

Since 1992 I have lived in a two-unit Victorian flat that my brother and I have carefully renovated. I am very concerned about living across the street from a 150,000+ square foot five-story office building. Instead of living on a busy residential street, I will live across the street from a substantial office complex better suited for the financial district than in neighborhood. My property values will be adversely affected because it is less desirable to live in an office park than a mixed-use residential area.

Visual Character of the Proposed Project

I am concerned about the impact a five-story building will have on the street and disagree with the report's conclusion that the impact will be minimal. The report contends that 166,815 square feet would not adversely affect the neighborhood when taking into consideration the amount of commercial space in the "area". The report does not address

5d
11a

the impact of such a substantial project on the properties immediately adjacent to it, but includes the commercial district to the north in the "area". The project will be higher, denser and have substantially greater square footage than any project near it. While there are commercial projects down the street, Bryant Square is surrounded by mostly residential properties. The report should analyze the impact a mid-rise office building would have on the surrounding residential area rather than merely comparing it other developments further down the street.

5d
11a

The project is to replace a light density two-story wood constructed mixed-use building with a five-story mid-rise office building. The large size and just plain volume of space will have a negative visual impact so profound as to negatively affect property values for any surrounding residence.

Views

The new project will be several stories higher than the existing structure. Currently houses along 2100 Bryant Street have a view of Potrero Hill. If the five-story office building is constructed those views will be eliminated. Additionally, because the proposed office building will be by far the largest structure in the area, any property that faces the proposed office building will have a substantially different view. Therefore the exterior of the structure will be critically important. In fact, because the building is so oversized for the area that any vista of the Mission will be offered an unobstructed view of the project. The report does not accurately reflect these facts.

5c

Intersection Conditions

The intersections of Bryant and 19th and Bryant and 20th are currently extremely busy. To suggest that they are designated a LOS A rating is not to take into account the nature of the congestion that we currently face. The block already has considerable traffic problems, including double parking and illegal parking in driveways. The additional traffic will further overload the street. As the report mentions, because the neighborhood will be so radically changed, parking meters may be required. For a residential area which currently has no limitations on parking and traffic to become an office district with parking meters and possible other traffic mitigation cannot be considered anything but a significant. The EIR does not address this real change to our neighborhood.

71
7b

The EIR does state that parking occupancy rates run at 100%. According to the reports own analysis, Bryant Square will run a deficiency in parking even assuming all the parking spaces are constructed as planned. If the alternative plans are instituted the parking ratio will be met, but the problems will still remain. The project will cause even more parking problems in the neighborhood. The underground parking will be valet which means that the developers intend to park more cars than they have parking spaces. In that event the parking disparity will be even greater than the EIR indicates. Finally, given the choice of paying for parking and surrendering keys to a valet service or parking on the street for free, most people with the need to park will utilize street parking and only park in the garage if no free street parking is available. The result will be no parking on the street but space available in the parking lot, which means that the full impact of the

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parking problem will be much worse than the numbers in the EIR indicate. The EIR does not address the impact of parking given these considerations. If it did, the EIR would find that unrestricted parking no longer exists for many blocks in the area, and that the quality of life in the neighborhood will be adversely impacted.

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To suggest that because the EIR does not find that the traffic congestion meets either a level D or F and therefore is not a problem does not address the fundamental problem that the project presents with the increase in traffic. Their conclusion might have merit if the project was to be located in a commercial district but it is not. Suggesting that people take the public transit to work is fine, but what about the people who live in the area? Are they expected to give up their car for lack of parking or suffer the inconvenience or possible danger of having to walk blocks to get to their house? The EIR does not adequately address this matter either.

7l
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7o

Project Trip Generation

The EIR provides a Proposed Project Trip Generation analysis. The report uses ratios as provided by the planning department. The EIR indicates 3,324 new trips will be taken on a daily basis to the project. Given the fact that the current structure has a very low-density use, the increase in new trips per day is huge, over a 300% increase. The impact on the residential neighborhood was not explored by the EIR but can only be substantial. As the EIR indicates, the neighborhood is already very busy, but adding the extensive number of new trips can only greatly overwhelm the neighborhood and substantially change its character. As a resident, I can anticipate delays getting to my house, driving on my block and increased noise and congestion outside my door.

7i

I object to the characterization of the 2100 block of Bryant as commercial as stated in the Site Circulation. The fact is there is one restaurant (not two as stated in the EIR) and one mixed office, a residential brick building and one other business, a sheet metal operator. The majority of other properties on the street are solely residential. Putting the garage driveway on Bryant will mean much greater congestion for my block. The impact of a garage entry on Bryant Street on the neighbors was not addressed in the EIR.

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Parking Impact

The project can only get close to meeting its parking requirements if it provides valet parking services which means that the project will have 122 fewer parking spaces than needed as required by code. To get around this requirement, the developer intends to provide valet services so that more cars can be parked in the garage than there are spaces. This requires an ongoing service, which will be expensive for the developer of the project to maintain. I am concerned that once the development is completed that the developer will stop using the valet service. What, if any, remedies are available to insure that the valet service will continue?

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Valet parking is a proper method of providing parking in a downtown area, not a residential area. The mere suggestion of valet parking indicates the full extent of the parking problem. Anyone visiting the Site will first look to park on the street before

2c

paying what will be extremely high parking costs of a valet service. Also, valet services are inconvenient, the driver must surrender his keys and face the prospect of an extended wait for his or her car. The alternative is to park on the street, in front of my neighbors and my house. Therefore we have no parking for our visitors or our own cars.

2c

The alternative suggested by the EIR is to install meters or time restrictions on the street. I live in a residential area and to put meters in front of my house demonstrates the very significant impact this project will have on my life. There is no way the project, given its current design can successfully mitigate the parking problem. Further, the impact on the neighborhood will be profound and the residents surrounding the project deserve better.

7b

Construction Impact

The traffic impact on construction will be burdensome on the neighborhood but temporary. Special care should be taken during construction to mitigate the noise, congestion and disruption caused by the construction. Construction should be limited and controlled in light of the fact that the work will be in a residential area.

8

Alternatives

The EIR listed several alternatives to the proposed project. The fundamental problem with the proposed project is the size. The developer is trying to cram a big box that is too dense and too many stories for the site. Anything that reduces the size goes a long way to reducing the negative impact on the neighborhood. A project the size of the current two story wood constructed building might be an example of a project that would not unduly impact the neighborhood negatively.

20a

Conclusion

The EIR does not adequately address the substantial problems concerning Bryant Square and should be substantially amended. The report misstates the area to be commercial when it is primarily residential, which should greatly change the conclusions of the report. The EIR does not address the very serious and real problems of parking and traffic. The EIR does not deal with the impact such an oversized and dense project would have on the balance of uses in the neighborhood. Finally, the size and view impact is understated. This project would dwarf all other buildings in the area and greatly reduce the quality of the neighborhood.

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I strongly suggest that the EIR be sent back to address the issues specified in this letter.

Very truly yours,



Robert C. MacPhee

Date: 01/05/2000 8:37 AM
 Sender: "Charlene Aparicio" <charlene_aparicio@sfgf.org>
 To: Joy Navarrete; <Jim_McCormick@ci.sf.ca.us>
 Priority: Normal

Receipt requested

Subject: FOR 98.635E BRYANT SQUARE PROJECT

Dear Planning Commission,

I live at 2841 - 20th Street directly across the street and I resent

the fact that Planning Commission is even considering to decimate the

Mission District even further than it already has. The proposed

5-story building is not consistent with the spirit of the neighborhood. It will be the biggest building in the area and look

like it was dropped in from downtown with no consideration to it's

surroundings. Why can't the developer match the same dimensions of

the building that's already there? Why can't the developer at least

try to match the surrounding architecture? It is ugly and will

obstruct the view of the residents (including myself).

When I look

out my window, I do not want to see a huge, ugly building that

screams, "I'm only here for the money!"

I like my neighborhood because of it's industrial/residential flavor.

If I wanted to look out of my window and see a bunch of Gaps or retail

stores, I would live downtown. The construction of this huge building

that doesn't even try to fit in with surrounding architecture/landscape will definitely prevent me from the quiet

enjoyment of my home.

This huge building is to be filled with stores that that sell things

we can't afford to cater to wealthy people who don't even live here.

The offices that move in there will not be doing recruitment in our

neighborhood, they won't be adding to our quality of life or saving us

a commute. People will come and go taking up space, making noise and

causing congestion because they don't care, because they DON'T LIVE

HERE. That is not speculation, that's human nature.

The theory that San Francisco government entities are trying to move

out people to make San Francisco the playground of the rich will be

even more proven if this project is allowed to go through.

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It will be

an eyesore and of no use to us residents either in a
consumer or

employment sense which is why it to be constructed in the
first place,

isn't it? PLEASE DO NOT DESTROY MY NEIGHBORHOOD !

Sincerely,

Charlene Aparicio
2841 - 20th Street
San Francisco

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2a

Date: 01/05/2000 12:23 PM
Sender: Jim McCormick
To: Joy Navarrete
Priority: Normal
Subject: Fwd: Bryant Square Project -- Urgent
To: Planning Commission
Re: Bryant Square
CC: Office of the Mayor, SF Chronicle

The proposed Bryant Square mega-building is a disaster in waiting for residents of the Northeast Mission. It must be mitigated.

The building violates height limits, is totally out of character for our neighborhood, requires numerous exemptions to our planning code, and perhaps most importantly will displace longtime residents and businesses.

What exactly is the point of planning codes if they are bent at will to accomodate developers whose projects are opposed by neighborhood businesses and residents?

\$100,000 campaign contribution aside, the commission must demand accountability from the Bryant Square developers. Long time Mission residents like myself will not stand idly by while our neighborhood is overrun by businesses given a blank check by their allies in government.

We realize our neighborhood is changing. But we demand a just transition.

Sincerely,

Belinda Griswold
642 Shotwell
546-6334 x313

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January 4, 2000

Environmental Review Officer
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

re: **Draft Environmental Impact Report (DEIR)
Bryant Square Project
Planning Department File #98.635E**

I am a resident in the neighborhood of this project. I live at 720 York St., #210, on the East side of the building. In that location, I will not directly experience the visual and shadow impacts of the proposed project which are the primary focus of my comments below. Hence, this letter expresses my general concerns as a neighborhood resident.

Summary of contents

1. Analyses in the DEIR which are inadequate
2. Unanswered questions regarding the environmental impacts of the proposed project
3. The DEIR should have analyzed an alternate which complies with the San Francisco Planning Code and General Plan
4. Inaccuracies in the DEIR
5. Summary of issues to be addressed in the final EIR

1. Analyses in the DEIR which are inadequate

1a) The conclusions about height and bulk impacts are not consistent with the findings of fact

The proposed project is on is the only block with a 65' height limit in a large area of 50' and 40' height limits. The isolated 65' height limit on this block is hard to justify because the tallest existing building on the project block is less than 50' high. If the 65' height limit must be allowed, then the proposed project would be 30% taller than any existing or future building in an area of at least 29 blocks. (DEIR, 3-3 & 2-8.)

In addition, above 50', which is and will be the maximum height of all surrounding buildings, the proposed project would be 180% of the maximum size allowed by the planning code. (DEIR, 1-3.)

Such a project would be a significant variance from the Policies 5 & 6 of Objective 3 of the Urban Design Element of the San Francisco General Plan which state that the height of buildings should relate to the height of existing development (Policy 5), and the bulk of buildings should relate to the prevailing scale to avoid an overwhelming or dominating appearance (Policy 6). (DEIR, 2-17.)

And yet this DEIR declares that the height and bulk impact of the proposed project would be not significant. (DEIR, 3-6.) This conclusion is inadequate and does not match the findings of fact in the document.

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1b) Shadow impacts are not documented

The proposed project would reduce sunlight access for the buildings and sidewalks to the West of the site across Bryant Street by many hours for every week of the year. In the San Francisco microclimate, this would be a significant degradation in environmental quality.

Allowing this increase in shadows would not be consistent with the second Priority Policy of the 1986 Accountable Planning Initiative, which calls for the "protection of neighborhood character". (DEIR, 2-14.)

But the Bryant Square DEIR does not present any documentation of what the shadow impacts would be, compared to existing conditions, for the proposed project or any of the alternates. The additional shadows from the proposed project are dismissed as being of an amount which is "generally accepted in urban areas". (DEIR, 3-9.) Accepted by whom?

The DEIR's conclusions about proposed additional shadows on buildings and sidewalks are not substantiated by any facts, surveys, quantities, or visual studies. On this topic, the DEIR's analyses are inadequate.

1c) The study of the Reduced Height Alternate is misleading and uses questionable methods

For this alternate, the height of the building at 2125 Bryant is reduced more than it would have to be to comply with height and bulk code restrictions. Also, a disproportionate number of parking spaces is eliminated. Then this alternate is rejected because the parking shortfall for it would be greater than the shortfall for the sponsor's preferred alternate. (DEIR, 1-12 – 1-13; 6-2 – 6-4.)

The focus of this alternate is supposed to be reduced height. But the alternate also reduces parking by a large quantity and then is rejected because there is not enough parking. This methodology is unsound.

Furthermore, the DEIR makes no reference to, or any study of, the shadow reductions for neighboring buildings and sidewalks that would result from the reduced height alternate. Hence, a major positive advantage of this alternate is not discussed.

Finally, another reason given for the rejection of this alternate is that 2101 Bryant would be upgraded only to meet seismic and ADA legal requirements. (DEIR, 6-3 – 6-4.) It is implied that this is, somehow not sufficient or that the sponsor's preferred alternate will provide more seismic and ADA upgrades than are required by law. This point should be explained more completely.

1d) The DEIR does not analyze the adequacy of the proposed open space

The DEIR says that one of the project sponsor's goals is to provide "safe and attractive open space". (DEIR, 2-12.) This goal is not met by the narrow alleys and small courtyard in the proposed project.

These spaces will be an important daylighting amenity for the occupants of the buildings on site. However, the alleys and courtyard are not adequate public open space. The entrance to them will be not obvious and the access hours will be limited. Furthermore, these spaces are narrow and will be in shadows almost all day long, and hence not attractive open space in the San Francisco microclimate.

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Since the proposed buildings will be primarily for office uses, the issue of an open space requirement should be addressed in the EIR.

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2. Unanswered questions regarding the environmental impacts of the project

2a) Does the proposed project comply with the FAR limit for the site?

In the DEIR, I was not able to find the FAR limit for the site, or any reference to the project's compliance with it. If the project exceeds the FAR for the site, this should be stated in the EIR, together with other proposed exceptions to code requirements, i.e., for bulk and parking, that the proposed project would need for approval.

4c

2b) What public benefits does the project provide which would justify an exception to the code parking requirements for a Planned Unit Development (PUD)?

According to the DEIR, the planning code requires that for PUD approval, which the proposed project is seeking, a development "shall provide off street parking adequate for the occupancy proposed". (DEIR, 3-31.) This project would provide 53 fewer spaces than would be adequate for the use proposed. (See Table 7 in the DEIR, and item 4c below.)

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The DEIR finds that the consequences of this parking shortfall would be "increasing competition for limited on street parking, which is currently near or exceeding capacity". (DEIR, 1-6.) Furthermore, "[n]o off street parking facilities are open to the general public within a two block radius of the project site". (DEIR, 3-22.) And "[p]arking demand is observed to exceed supply on several streets. On many blocks, unattended double parked cars were observed, trucks blocked the sidewalks and streets ... and cars were parked on the sidewalks both in driveways and parallel to the curb". (DEIR, 3-23.)

The consequences of a 53 space parking shortfall for the proposed project would be a further deterioration of the documented over-parking, in addition to an increase in the number of cars driving around the neighborhood looking for parking.

So the PUD code requires adequate parking, and the finding of fact in the DEIR is that the inadequate parking of the proposed project would worsen already bad conditions in the neighborhood.

And yet because of the City's Transit First policy, the DEIR is obliged to state that the parking impacts of the proposed project should not be considered to be significant. (DEIR, 3-34.) This assertion in the DEIR is clearly not consistent with the PUD section of the Planning Code and not consistent with the findings of fact in the DEIR – which are that the 53 space parking shortfall for the project will cause a deterioration in the conditions and character of this neighborhood.

Consequently, it seems fair to ask this: What public benefit does the project offer that would justify the proposed PUD parking code exception and consequent detriment to the neighborhood?

2c) What public benefits does the project provide which would justify an exception to the code bulk requirements for the site?

As proposed, the project would be 30% higher than any existing or future buildings in an area of many blocks around the site. The proposed project would also require an exception to bulk requirement for the part of the building that would rise above all other buildings in the neighborhood – this part being nearly twice as large as the limit allowed by code (see item 1a above).

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It is already questionable that the buildings on this site alone should be allowed to be much higher than surrounding buildings. Why should these buildings also be allowed to exceed bulk limits? What public benefit would be provided by the proposed project that would justify this exception to the code?

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3. The DEIR should have analyzed an alternate which complies with San Francisco Planning Codes and the General Plan

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3a) The code compliant alternate should have 17% less occupied space than the proposed project but keep all the parking

The parking demand for the proposed project would be 309 spaces, and the parking shortfall would be 53 spaces (see Table 7 in the DEIR, and item 5c below). In other words, the occupied space of the project, and hence the parking demand, should be reduced by about 17%, while all of the parking of the proposed project is retained. Then the project would "provide off-street parking adequate for the occupancy proposed" as required by code for PUD approval.

3b) For the code compliant alternate, the reduction in occupied space should come primarily from the 4th and 5th floors

The proposed 5th floors of 2125 Bryant and 2101 Bryant should be reduced in square footage to comply with code limits for bulk above 50' in height. As a compromise, a combination of reductions on both the 4th and 5th floors of 2125 Bryant, with some code-exceeding bulk on the 5th floor, could be considered.

The resulting form would significantly reduce shadow impacts on the buildings and sidewalks across Bryant Street to the west of the project site. The final EIR should include studies of shadows in this area for this code compliant alternate compared to the proposed project and existing conditions.

3c) The code compliant alternate should provide open space with food service at the southwest corner of the site (20th & Bryant)

Because most of the proposed project is for office use, the sponsor should be required to provide proportionate open space that is accessible and usable.

The southwest corner of the site, at 20th & Bryant, offers the best access to direct sunlight. An open space there would also soften and enrich the otherwise harsh pedestrian environment presented by the proposed building at that corner and all along Bryant Street (see the Visual Simulation on page 3-12 of the DEIR).

An open space and or accessible high atrium at this corner, with adjacent food service, would provide a public amenity which would help to mitigate some of the negative impacts of this project on the neighborhood. This element should be included by the project sponsor and analyzed in the final EIR.

4. Inaccuracies in the DEIR

4a) The elevation on page 2-8 misrepresents the proposed project's size

The South Elevation on page 2-8 misrepresents the project as being smaller than what is actually proposed. This is most obvious when comparing this elevation with the visual simulation on page 3-12. The South Elevation on page 2-8 is also inconsistent with the West Elevation on page 2-8 and the 4th floor plan on page 2-10.

1b

4b) The number of parking spaces is overstated in some parts of the DEIR

In several places, including pages 1-3, 1-15, and 2-7, the parking for the proposed project is described as "203 independently accessible and 301 valet-assist parking stalls". This would be a total of 504 spaces. This number does not match the smaller and more credible totals in Table 7 on page 3-32.

1a

4c) The parking shortfall for the proposed project is understated in some parts of the DEIR

In several places, including pages 1-5, 1-13, 1-16, and 6-3, the parking shortfall is identified as 24 spaces. This is misleading. In the project actually proposed by the sponsor, the parking shortfall would be 53 spaces.

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As indicated on pages 3-32 – 3-33, the sponsor intends to subtract 45 spaces for the occupants of 720 York. The sponsor is required to do so because these parking spaces are written into the purchase agreements for their respective units.

Hence, the sponsor's actual proposal is the 2nd scenario in Table 7 on page 3-32, which has a shortfall of 53 spaces. In other words, the occupied square footage of the sponsor's preferred alternate is about 17% too large compared to the amount of parking that is proposed.

4d) There may be errors in the square footage totals reported in the DEIR

Between the Initial Study and this DEIR, the portion of the building at 20th & Bryant grew upwards by one floor. But the total square footages of the two different building configurations in the Initial Study and the DEIR are reported as being exactly the same. How did the building add one floor at the southwest corner, but not change in area by a single square foot?

5. Summary of issues that should be addressed in the final EIR

4d

5a) The height and bulk impacts of the proposed project should be re-evaluated (item 1a above).

4e

5b) Visual studies and analysis of shadows on the sidewalks and buildings west of the proposed project should be presented for existing conditions, the proposed project, the reduced height alternate, and a code compliant alternate (items 1b, 1c, and 3 above).

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5c) The reduced height alternate should be restructured and analyzed in a more "good faith" manner (item 1c above).

20a

5d) The adequacy of the proposed open space and the question of an open space requirement for this project should be discussed (items 1d and 3c above).

4e

5e) FAR compliance or non-compliance of the proposed project should be documented (item 2a above).	4c
5f) The EIR should address the question of what public benefit the project provides that would justify an exception to PUD parking requirements (item 2b above).	2a
5f) The EIR should address the question of what public benefit the project provides that would justify 2 exceptions to Planning Code bulk limits (item 2c above).	
5h) The EIR should analyze a code compliant alternate with the following characteristics (item 3 above): <ul style="list-style-type: none"> Occupied space reduced by 17% compared to the proposed project All proposed project parking retained Occupied space bulk removed primarily from the 4th and 5th floors of the proposed project Open space with food service at the southwest corner of the site (20th & Bryant) 	20a
5i) The elevations on page 2-8 should be corrected to represent the full size of the proposed project (item 4a above).	1b
5j) The descriptions of the number of parking spaces in the proposed project should be corrected to match the number on Table 7 (item 4b above).	1a 7c
5k) In the DEIR text the descriptions of the parking shortfall quantity should be corrected to indicate the 53 space shortfall actually proposed by the project sponsor (item 4c above).	7c
5l) The square footages for the project in the Initial Study and the changed project in the DEIR should be re-calculated (item 4d above).	1a

This concludes my comments on the Draft EIR for the Bryant Square Project.

J. Richard Osborn

J. Richard Osborn
720 York St., #210
San Francisco, CA 94110

3 January 2000

The Environmental Review Officer
 San Francisco Planning Department
 1660 Mission Street
 San Francisco, CA 94103

Re: Bryant Square, Draft Impact Report 98.635E

As a property owner, and neighbor of the above referenced project, I am writing this letter opposing the scale of the project and the overall impact it will have on the neighborhood. The opposition is based on some of the dubious assumptions that are made in the EIR in justifying the proposed density, the request for a zoning variance, and the anticipated parking demand. I understand the Developer is now proposing the alternative known as '6.7 Parking-Demand Compliant Alternative' as the preferred design.

The erroneous assumptions are: the anticipated numbers of employee and employees per usable square foot as well as the resultant impact on the demand for parking either on-site or on-street.

Employee Densities

The alternative calls for a gross square footage of 146,000 SF of office space. Assuming a building efficiency of 85%, this will result in a net usable area of 124,000 SF. Using the Building Department's Load Factor for offices of 1 person per 100 SF will result in a population of 1240. Even using the assumption of 150SF/PP will result in an office population of 827 people. Giving the project the benefit of the doubt, and assuming the lower office component of 827 people, the additional retail and light industrial space result in a population of about 900 people. This day time population will far exceed the demand for the proposed 601 spaces of on-site parking.

The report alludes to an idea that multimedia high tech use justifies using a higher square footage per person number, but has no hard data to support it. However, based on my experience as an architect with other high tech and multimedia companies the employee per square runs closer to the normal office load factor and resulting densities.

Without a more compelling justification for the larger building and shortfall of parking, the variance to exceed the **B bulk controls** should not be approved.

High tech and multimedia demographics and parking

Again as an architect who designs for similar types of companies, I have observed that the typical employee is a young, upward, mobile employee, who has seldom taken public transportation, has a car and expects to drive to work, and keeps non traditional commute work hours. They tend not to go directly home from work, but use their cars to frequent the bars, clubs and restaurants in the city in the evenings and after work, which is the whole reason these companies are locating to San Francisco in the first place. It is also life style that reinforces the need for a commute by car.

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Having lived in the neighborhood for 10 years I know that the existing level of public transportation be it Muni or BART does not make it as a viable alternative. Counting on public transportation to offset the deficit will not work. While Public Transportation First is a commendable goal, this project and the neighborhood should not have to pay the price of deplorable state of the MUNI service especially for routes that do not directly serve downtown.

7k
7p

The report is unrealistic in its assumptions and conclusions regarding the demand for parking both on and off site and the impact the project will have on the immediate neighborhood. The Planning Departments current requirements of 1car/500 SF for office space is unrealistic and outdated given the demographics and life styles of the proposed tenants and employees their level of expectations and use of the automobile.

Neighborhood Impact

Although the project lies in CM and M1 zoning district, the surrounding area to the east, west and south are residential RM2 zones. It is a residential neighborhood characterized by small, historically working-class one and two family houses on streets that run parallel to Potrero, Bryant, and Harrison. These streets are already overrun with automobiles. The scale of the neighborhood is not conducive to absorbing additional traffic or the demand for additional on-street parking that a project of this magnitude would bring, regardless of how much on site parking is available.

7m

19th and 20th Streets are currently heavily used during the morning and evening rush hour to connect the north end of the Mission and the Nimitz to Potrero Ave. and the Freeway. Potrero is already very heavily used as a feeder to the Freeway. It is a forgone conclusion that when arteries fill up, people use neighborhood residential streets as shortcuts.

No mention is made in the report of the impact of the other recently completed or anticipated projects in the area, such as the Harrison and 19th street project by SKS Development and the redevelopment of the two Best Foods sites (one still not complete) and the impact these developments will have on the traffic patterns, number of additional vehicles, and their demand for on street parking etc. also.

17a

Urban Design

It is my understanding, the design shown in the EIR has been superceded and I have not seen an alternative. However, it does raise serious questions about the developers understanding of urban design, the scale and nature of the neighborhood and their understanding of the need to integrate new and old buildings. While I am not an advocate for historical pastiche for new buildings, in an urban context, building facades are private signs and public enclosures of the street and should be good neighbors. The proposed strip windows and unrelenting half block long facade are neither an appropriate solution for Bryant street nor the neighborhood.

5a

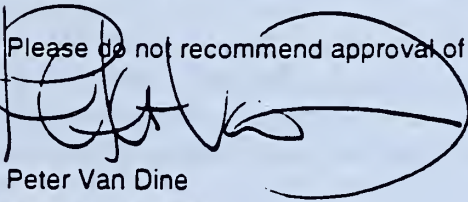
Conclusion

Our neighborhood has suffered the premature and inappropriate proposals of first a Bio Medical Zone and then the on-slot of pseudo live-work housing alternative. Although the neighborhood has gentrified, it is questionable as to the overall improvement in the quality of life.

Before a project of this magnitude is approved, there needs to be a comprehensive understanding about the changing demographics, space needs, and commuting habits of the multi media, high-tech, dot com companies that the city so badly wants.

The city is a small grained urban oasis in a state of big projects and bigger plans. The Planning Department needs to assume the leadership and to set the ground rule and guidelines how to integrate new and old and to keep San Francisco the vibrant and livable city it is.

Please do not recommend approval of the EIR and this project without further study.



Peter Van Dine
689 Florida Street

823 York Street
San Francisco, CA 94110
December 28, 1999

Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

RECEIVED
DEC 30 1999
COUNTY OF S.F.
DEPT OF CITY PLANNING

Dear Sir/Ms.

I am writing to express concern over the proposed "Bryant Square" project to be built on Bryant Street between 19th and 20th streets.

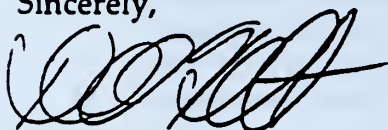
As a nearby resident and homeowner just 1 block away, I oppose the current plan for the following reasons:

- 1) an office building significantly higher than all current surrounding buildings would obscure views, dwarf single family homes and flats across the street, and alter the character of the neighborhood
- 2) A huge office building without adequate parking for all tenants would worsen an on-street parking situation. The parking situation has become terrible very quickly in recent years, mainly due to other projects such as live-work lofts that were also exempt from parking requirements (such as the Mill building, directly behind the proposed office building on York Street, which has over 50 units and fewer than 20 parking spaces).

I am not opposed to development in the area, and in fact I currently work for a company which may be looking for office space in the area, as a large enough space cannot be found in SOMA. However, the rampant development in the area that has been exempt from parking requirements and has taken no account of the character of the neighborhood has done a tremendous amount of harm.

I hope that new developments in the area can be required to meet reasonable requirements on height and parking regulations, and I would be happy to do anything I can to help achieve a reasonable compromise.

Sincerely,



David Hecht
823 York Street
415-546-4819
dhecht@ework.com

2a

December 30, 1999

RECEIVED

JAN - 7 2000

CITY & COUNTY OF SF
PLANNING

I am writing in regards to the proposed office complex on Bryant Street, between 19th and 20th Streets. I own and live two blocks away from there. I do not believe that this development should be built as it is currently planned.

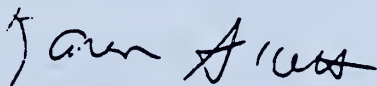
Architecturally, this building is at odds with the rest of the area. It does not reflect the character of the neighborhood, and is not interesting enough to justify exemption from the prevailing standard. It is set on the edge of a residential area, and should show some sensitivity in its design. It is, instead, boring and characterless.

The proposed building is also taller than the standard height in the area, and will obstruct the sunlight of many structures. The building is 65' tall and is set in the middle of 40' and 50' buildings. This is the only block zoned for this height in the area. It will not affect the scene from my window, but I do not think anyone should have to trade a view of the sunset over Twin Peaks for this featureless structure.

I also cannot believe that anyone would consider a parking variance. Haven't we learned from the South of Market mess? Parking is a problem throughout San Francisco. So far, it is not a large problem in the North East Mission, but it will be if the Planning Commission keeps on allowing developers to build without providing parking.

Please do not approve this development as it now stands. Please do not put the greed of the developers ahead of the concerns of the residents.

Sincerely,



Karen Scott
2635 20th Street
San Francisco, CA 94110

2a

720 York Street
Unit 220
San Francisco, California 94110

1999 December 29

The Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

Dear Sir or Madam:

Because it ignores a 120-year-old historic building, rubber-stamps objections to harmonious development plans, appeals to outdated transportation data, and contains inconsistencies, the *Bryant Square Draft Environmental Impact Report* should be revisited.

In the comments which follow, "the *Report*" refers to the *Bryant Square Draft Environmental Impact Report* published on 1999 November 20, and "the Project" refers to the development plan described therein. Page number references of the form x-y point to the *Report*.

1. Historic building ignored

- (a) Ostensibly, "[t]he proposed new building to replace [the buildings at 2125 Bryant Street and 2850 Twentieth Street] would be compatible with the scale, form, and fenestration pattern of the adjacent historic building at 2101 Bryant Street" [Page 1-4; see also Page 3-9]. Though "[n]o other buildings on the project site have been identified as significant" [Page 3-15], the Mill Building at 720 York Street, which occupies the eastern side of the Project block and borders on the Project site, is of some historical value, according to materials commissioned by the Project sponsor to market the live/work lofts in that building. I request that information about the compatibility of the proposed new building with the Mill Building be added to the *Report*, and that any incompatibility be declared to be a significant visual and historical effect. If the proposed new building were five storeys tall [Page 1-3], how would it be compatible in scale with the Mill Building, which is only two storeys tall? If the proposed new building had a flat roof [Page 3-12, bottom picture], how would it be compatible in form with the Mill Building, which has a sloping roof? If the proposed new building had continuous, industrial-style windows [Page 3-12, bottom picture], how would it be compatible in fenestration pattern with the Mill Building, which has rows of individual wood-frame windows?

Marcelin / 1999 December 29 / Page 1 of 4
R P/m

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- (b) If the two-storey retail/office building proposed to replace the one-storey shed at 700 York Street [Page 1–3] occluded the historic Pacific Felt Company sign painted on the northern face of the Mill Building [Page 3–13, bottom picture], would there indeed be “little noticeable visual change” [Page 3–9]? And would not the replacement building be visible from the corner of Bryant Street and Nineteenth Street [Page 3–11, bottom picture]? I request that the proposed replacement building be shown in the visual simulation from the corner of Bryant and Nineteenth Streets, and that a visual simulation of the occlusion of the historic sign (taken from the northern side of Nineteenth Street between York and Bryant Streets) be added. I request that the quoted finding be stricken from the *Report* and that the proposed replacement of the shed at 700 York Street be declared to have significant visual and historical effects.
- (c) Compatibility criteria include not only scale, form, and fenestration, but also exterior building materials. If the proposed new buildings (and the proposed addition to the building at 2101 Bryant Street) were not constructed of red brick [Pages 3–12 and 3–13, bottom pictures], how would they be compatible with the historic buildings on the Project block, both of which have red brick exteriors? I request that information about the proposed exterior building materials, and their compatibility with the ones used in the adjacent historic buildings, be added to the *Report*, and that any difference in exterior building materials be declared a significant visual and historic effect.

2. Harmonious alternatives summarily rejected

- (a) The Project sponsor believes that the Reduced Height Alternative is economically infeasible, ostensibly because “the buildings in their current configuration and condition cannot generate the rental income...” [Page 1–13]. If the same three buildings would be demolished and the same one renovated under the proposed Project [Pages 1–2 to 1–3] as under the Reduced Height Alternative [Page 1–12], which buildings (plural) would remain in their current configuration and condition under the Reduced Height Alternative but not under the proposed Project, thereby justifying the Project sponsor’s belief? I request that the quoted justification be stricken from the *Report*. If any significant visual and/or historical effects are identified, I further request that the Reduced Height Alternative—which might mitigate these effects—be reconsidered, and that a reasonable and complete financial comparison of the proposed Project with the Reduced Height Alternative be added to the *Report*.

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The Project sponsor also rejects the Reduced Height Alternative because this alternative "would provide less modern office space..." [Page 1-13]. I request that this remark be clarified. Does the Project sponsor believe that the Reduced Height Alternative would provide a smaller amount of office space than would the proposed Project, or that the office space provided under the Reduced Height Alternative would not be as modern as that provided under the proposed Project?

- (b) According to the *Report*, the buildings at 2101 Bryant Street, 2830 Twentieth Street, and 2850 Twentieth Street are "vacant" [Table 1, Page 2-7]. So that the reviewers might have an accurate concept of the pre-existing land uses, I request that the word "vacant" be qualified. What percentage of the floor space in each of these buildings, under each category in the "Existing Land Uses" column of Table 1, Page 2-7, was vacant as of the date on which the *Report* was published, let alone the date on which the Project sponsor purchased the Project site? According to the *Report*, "[t]he proposed uses...would not divide or disrupt an established community" [Page 3-6]. I request that this remark be stricken from the *Report*, and that the proposed change in land use be declared a significant effect. Artists who for many years occupied buildings on the Project block are not accommodated in the expensive (\$200,000 to \$610,000) live/work lofts at 720 York Street, in the proposed Project, or elsewhere in the neighborhood (where similar land use changes are occurring). For evidence of a general pattern, see "Evicting Art", the *San Francisco Bay Guardian*, 1999 September 29. If the land use effects are found to be significant, I request that the All Industrial Alternative—which might, by preserving inexpensive, undivided, and unfinished space, mitigate them—be reconsidered.

Also, the Project sponsor rejects the All Industrial Alternative "because it would not meet the objective of providing affordable modern office space..." [Page 1-15]. Given that affordability is not among the stated Project goals [Page 2-12], I request that the word "affordable" be stricken.

3. Outdated transportation data cited

- (a) According to the *Report*, "[n]o significant transit impacts would occur as a result of the implementation of the proposed Bryant Square project" [Pages 1-5 and 3-30]. On 2000 January 05, one day before the public hearing for the *Report*, the San Francisco Municipal Railway (Muni) will hold the latest in a series of public meetings regarding changes to Potrero Hill Muni service, service on which the transit impact findings depend. I request that the transit impact be reevaluated in light of the proposed service changes. If service reductions are planned, might these not affect the 'no impact' finding? If service increases are planned, what is Muni's stated rationale for the increases? If the rationale includes supporting new development or adapting to new land use trends in the neighborhood, might this not contradict the 'no impact' finding?

4. Inconsistent drawings and numbers included

- (a) From the "Fourth Floor Plan" [Page 2-9], it appears that the face of the proposed office building which would come closest to the western side of the live/work building at 720 York Street would be approximately 28 m (metres) long. From the "Site Plan" [Page 2-6], it appears that the same face would be approximately 49 m long. I request that the two diagrams be made consistent. And according to the Report, "the new shading...would be limited in scope, and would not increase the total amount of shading above levels which are common and generally accepted in urban areas" [Page 3-9]. Given that the proposed office building would be so close to and so much taller than the existing live/work building at 720 York Street, I request that this remark be deleted, and that a significant visual effect be declared. How many live/work units would be in the shadow of five-storey office building, and at what hours of the day?
- (b) According to the *Report*, there would be "301 total parking spaces (including valet-assisted spaces) provided for the Bryant Square project" [Page 3-33]. Elsewhere, the *Report* refers to "203 independently accessible and 301 valet-assist parking stalls" [Page 1-3]. I request that the parking figures be made consistent.

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I have submitted these comments in writing because I will not be able to attend the public hearing scheduled for 2000 January 06. Please send a copy of the *Final Environmental Impact Report* to the address at the top of this letter, so that I may verify that each of my comments has been duly considered.

Yours truly,

Regis Paul Marcelin

Regis Paul Marcelin

To: Environmental Review Officer, San Francisco Planning Department, 1660 Mission St., SF, CA 94103

Comment on the Bryant Square Project

I am a neighbor of the Bryant Square project. I occupy, and own, the rowhouse at 2605 19th Street. I first moved to the Mission District in 1981. I am a writer with a special interest in, and knowledge of, transportation issues.

As a general comment, the proposed five-story office building at 20th and Bryant is a blank modernist box designed to maximize high tech office space (and thus the owners' profits) on the site. It makes no concessions to the architectural legacy or character of the Mission District, nor does it offer the existing population of the Mission prospects of employment (except maybe as parking valets) since few current Mission District residents are likely to be employed in the "high tech and multimedia" offices envisioned for this site. It's another instance of the trend towards the work space of the city becoming a high-tech corporate monoculture. Now for specifics:

Transit First Should Mean Transit First

My first specific objection to this project, as described in the EIR, is that it clearly violates the city's alleged Transit First policy. Proposition M stated that use of automobiles for commuting was to be discouraged. Yet the project is clearly designed with the assumption of the private automobile as the primary means of transport. The project provides no amenities or enhancements to the environment for transit users or pedestrians.

In the surrounding neighborhood 42% of the households do not have motor vehicles (as of the 1990 census). If this project is to fit into this neighborhood, it must take account of this high level of reliance on walking and transit in this area.

- **Way Too Much Offstreet Parking**

We need to consider not just this project in isolation but the cumulative effect of numerous recent projects which have led to the neighborhood being inundated with cars. The nearby "big box" Potrero Center acts as an automobile sump, attracting people in cars from miles around. Dumping more traffic on the streets here makes the Mission increasingly dangerous for kids and the elderly.

Providing lots of parking is one way in which people are encouraged to drive to this location. Parking is a subsidy to automobile use. If parking is scarcer, people are encouraged to use other ways of getting to this location, such as riding a bus, walking, or bicycling. The site is less than a mile from two BART subway stations, which is a walkable distance for many people. The 27-Bryant bus line is one of Muni's most reliable lines.

Suggestion: Reduce the parking garage to just one level, if the envisioned 150,000 square foot building is approved. If the office building for 20th and Bryant is scaled down, reduce the allowed offstreet parking even further.

- **Encourage Transit Use and Walking**

Why is it okay to allow a developer to provide amenities (a subsidy) for automobile use but provide nothing for walking and transit use? This is a blatant violation of the Transit First policy. The sidewalk on the Bryant Street side of this project has been narrowed to the width of a mere hallway, a ridiculous six feet at one point. With new construction we now have the opportunity to widen the sidewalk. Since retail storefronts are envisioned as a possibility for the ground floor of this building, this is another reason to widen the sidewalk.

Amenities that encourage transit use should also be required. It isn't sufficient that the developer merely buy off the Transit First policy by giving some money to Muni. This doesn't do anything to encourage transit use at *this* particular project. There is a minimalist Muni bus shelter at 19th Street but no facilities at

OFFICE OF
ENVIRONMENTAL REVIEW

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all for bus riders at 20th Street, despite the high proportion of households without cars in this neighborhood and the desirability of using transit, given the density and compactness of the Mission district. This project clearly is in violation of the San Francisco General Plan, Objective 11, Policy 7: "Encourage use of transit and other alternative modes of travel to the private automobile..." and Objective 11, Policy 3, "Encourage development that efficiently coordinates land use with transit service, requiring that developers address transit concerns...." It's as obvious as the noonday sun that this project has done zilch to encourage public transit usage (apart from any mandated payments to Muni, which is irrelevant to the characteristics of this particular project).

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Suggestion: Require more of a setback for the proposed office building at 20th and Bryant on the Bryant Street side and widen the sidewalk at this point, preferably to 20 feet. At a bare minimum, the narrower portion of the sidewalk near 20th Street should be widened to the same 15 foot width as the part of the block in front of 2101 Bryant. Other amenities to improve the walking environment should be provided; for example, planter boxes, street furniture, etc.

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Suggestion: Have the developer build special bus shelters for transit riders at 20th and Bryant Streets, northbound and southbound, with such amenities as: interior lighting, benches, bus information, trash receptacle (to reduce litter), and public phone. If the developer pays for it, they could take credit for it by displaying their own corporate name or info about their project.

How does this project help the residents of the Mission?

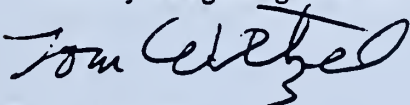
My second objection to this project relates to the mismatch between the needed employment opportunities for Mission District residents and the types of activities envisioned for this project.

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In a piece of propaganda that was mailed to me by Dan Kingsley of SKS, this project is allegedly going to provide "jobs for local residents." However, the existing population of the Mission district is predominantly working class, with a median family income in 1990 of \$27,000. Most Mission district residents do not have the backgrounds to apply for the "high tech and multimedia" jobs that the EIR states as SKS' intended use for the project. Moreover, SKS has already evicted the sweater factory from the 2101 Bryant building. This is an example of the displacement of blue collar jobs that is characteristic of this project. And dozens of working artists have been evicted from the contractors' sheds south of 2101 Bryant. What about their work prospects?

By changing the use of the 3-story "curtain wall" building at 2101 Bryant from light manufacturing to high tech offices, SKS will make this building less useful as far as providing employment for the actual Mission population. The propaganda from SKS talks about "reflecting the industrial character" of the area but apparently this does not go so far as to actually respect industrial work itself.

Suggestion: Require that the curtain-wall building at 2101 Bryant continue as before, accommodating light industrial uses. Require the previous tenants be given the opportunity to move back in, at rent levels pegged to their previous rent level. The cost of the seismic retrofit can be considered to be a payment to the community for agreeing to let SKS impose the 150,000 square foot monolith at 20th and Bryant.



T.L. Wetzels, PhD
2605 19th Street

12/28/99

To Whom it may concern,

The purpose of this letter is to voice my displeasure towards the proposed Bryant St office complex between 19th & 20th streets. I feel it is too large and will clash with the character of the surrounding neighborhood as well as causing even more parking problems.

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Sincerely,
Adrian Harris

Adrian Harris
847 Alabama St.

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December 27, 1999

The Environmental Review Officer
 San Francisco Planning Department
 1660 Mission Street
 San Francisco, CA 94103

Sub: Bryant Square (Between 19th and 20th)

Dear Sir,

As a neighbor of the proposed 5 story office complex, in general I support the plan because I believe that it will help upgrade this neighborhood. I have noticed over the years that every development along these lines has improved our quality of life with the sole exception being the congested parking situation. Furthermore, the design appears quite attractive to me and would be an enhancement for the neighborhood provided this does not require destroying any important historic properties to make way for it.

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In summary, I endorse the project with the hope that the Planning Commission will insist on appropriate parking spaces to be included in the building so that it will not increase parking pressure in this area.

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Yours sincerely,

SCHOENSTEIN & CO.

[Signature]
 Jack M. Bethards
 President & Tonal Director

JMB:ab
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DEC 30 1999

COUNTY OF S.F.
 PLANNING

Corinne Fendell
728 Hampshire Street
San Francisco, CA 94110

December 27, 1999

Environmental Review Officer
San Francisco Planning Commission
1660 Mission Street
San Francisco, CA 94103

Dear Environmental Review Officer,

I have lived at the above address since 1973 when I purchased the house in what was then well known as the inner mission and as such was affordable for myself and young family. Since that time I have of course watched time and "progress" take its course. Residential permits, parallel parking to accommodate an expanded hospital, a shopping center boasting a Pete's coffee shop, Gap and video chain store, coffee shops and four star eateries, live work lofts available at prices I still could not afford, (many of which remain vacant) and of course numerous large building projects still in progress, incomplete and unoccupied. While I welcome upgrading an area and thereby increasing property values I do question to what extent this can be done without sacrificing the character of this unique city.

It is also the area of the city where coding where the erection of a five story office complex which is being proposed to be built on Bryant Street could not and would not most likely be proposed on that part of the city which lies over these peaks a view of which would be replaced with a the cement wall of the backside of such this building. Although it seems that the zoning in this area does allow for such a building, is there a valid reason to further industrialize one of the few neighborhoods in San Francisco which is only just beginning to welcome in more families to a once shunned and "red-lined" area. I should note that I am happy to be in the company of such liberal establishments as KQED and The Bay Guardian, the latter I might add which grew out of its original abode and moved two blocks away to another nearby building. Whether a conscious gesture for the environment or done for practical economic considerations, I say bravo for recycling the neighborhood!

I urge the committee to consider the vision and hopes of those who had the courage to take up residence in this area and enhance and preserve its character before it was so fashionable and who are now at the very least dismayed at the thought of looking at a cement wall as if imprisoned in this unique neighborhood and city.

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Therefore, I would ask that at the very least the committee consider compromise to such a structure by restricting the height of this building, whose design hardly accommodates the tradition and spirit of the age in which the houses in this neighborhood were originally built. Further such a large establishment will only compound the congested parking which presently exists and which promises more problems with the many incomplete as well as abandoned and vacant buildings presently in construction in this area.

Sincerely yours,

Corinne Fendell

Corinne Fendell

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Sylvia R. Ramirez

721 Hampshire St
San Francisco, Ca 94110
415/641-9077
721 Hampshire Street
San Francisco, CA 94110
415/641-9077

December 27, 1999

Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Opposition to Proposed Bryant St. Office Complex Development

Dear Environmental Officer:

This letter serves to inform you of my opposition to the proposed 5 story office complex on Bryant Street between 19th and 20th Street based on the fact that this monster in our community will obscure our sunlight and views as well as change the character of our neighborhood.

Enough is enough! My family and I have lived in the neighborhood for over 22 years and we chose the area because it was quiet but central. In the past two years we have seen our once peaceful neighborhood turn into an area that is crowded, too expensive for families and where parking is getting as bad as downtown. We want our neighborhood to remain a residential area. A five story building this far south of market will clash with the character of the neighborhood. There are three-story buildings a block north of the proposed project but they do not block other residential areas. In addition, most of the homes in the area do not have garages and depend on off street parking. The newly built multi-story buildings in the area have made off street parking problems so bad that I have witnessed several parking fights. This new building will add to the rage and madness. Are we to leave a legacy of unbridled growth for our future generations to fight over or are we trying to create a safe, urban living environment for our future generations to enjoy.

We implore you to listen to the community that will be burdened with this building and to limit the growth in this neighborhood. My family campaigned and voted for Willie Brown who promised to work for responsible growth. I am sending a copy of this letter to him. I know he values the concerns of residents that will be impacted by this proposed building.

Sincerely,

Sylvia R. Ramirez
cc: Mayor Willie Brown

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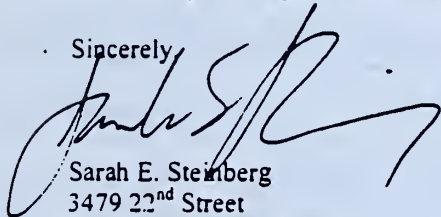
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To: Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

I believe the proposed 5-story structure on Bryant between 19th and 20th Streets is too large a structure for the neighborhood, and will permanently alter the neighborhood's character for the worse. (I must say, this piece of construction is really only a drop in the bucket, considering how developers have been busily altering San Francisco's Mission, SOMA, and 3rd Street corridor neighborhoods for a while now without considering the neighbors.) I hope this construction is stopped.

Sincerely,



Sarah E. Steinberg
3479 22nd Street
San Francisco, CA 94110

City & County of S.F.
Dept. of City Planning

DEC 27 1999

OFFICE OF
ENVIRONMENTAL REVIEW

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Sylvia Pera
2202 Bryant St.
San Francisco, CA 94110

Dec 26, 1999

Environmental Review Officers
San Francisco Planning Dept
1660 Mission Street
San Francisco, CA 94103

Dear Sir: Re: Case File 98.635E

I am writing to lodge a protest against the building of a 5 story office complex on Bryant Street between 19th and 20th streets. Now there is a properly sized Arts Building which we were happy to see renovated several years ago. Now everyone has been evicted and you want to OK a huge 5 story building in its place. Madness! Utter Madness! In the past year the car traffic and foot traffic has become congested. There is no room for another new car to park in

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this neighborhood. Any new building would need a full garage under it. A building taller than 3 stories would cut sunlight in a wide circle around it. The picture shows a modern glass building - not attractive and most certainly not in keeping with this brick warehouse and victorian house neighborhood.

It truly makes me sick at heart to think about what damage this giant could do to us. We have lived in this neighborhood for 20 years and find that old does not mean bad.

How can you keep changing the rules for big developers? Why does "a parking shortfall" rate a variance instead of a big fat NO: a city includes ordinary people living in modest neighborhoods,

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but you seem intent on doing
away with much of that. Please
reconsider this giant mistake.

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Paul and Sylvia Pera
2202 Bryant Street
San Francisco, CA 94110

MEDEIA MAQUIS AND ROBERT GARCIA

925 Alabama St.
San Francisco CA 94110
(415) 282-9463

12-26-99

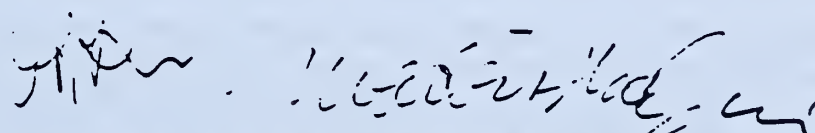
Environment Review Officer
San Francisco Planning Department
1660 Mission St.
San Francisco CA 94103

Dear Planning Department,

I live at 925 Alabama Street and I oppose the Bryant Square commercial development for the following reasons:

1. The building is too tall.
2. Parking is already difficult and will become impossible.

Sincerely,


Robert Garcia and Medeia Maquis

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December 26, 1999

David Maltz
722 Hampshire St
San Francisco, CA 94110
(415) 308-0964

Environmental Review Officer
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

Re: Bryant Square Project EIR 98.635E

I am writing to express my dismay with the conclusions of the Environmental Impact Report recently published by your office. As a neighborhood homeowner, I can assure you that the impacts of this development will be far more significant than the report optimistically predicts. While I am not opposed to commercial development in general, I feel strongly that if we are to preserve the unique character of San Francisco and the Mission in specific, care must be taken to exercise restraint and responsibility.

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My objections to the EIR center on four main points: architectural integrity and consistency, parking and congestion, obstruction of views, and general process concerns. I feel strongly that a reasonable compromise can be found that will serve to provide sufficient financial rewards for the developers while taking into account neighborhood character and quality-of-life issues.

1. *Architectural Integrity and Consistency*

As depicted in the EIR, the proposed project is a radical departure in style from any buildings in the neighborhood. The redevelopment of the Green Glen, the Mill Building and the Hellman's Mayonnaise Factory have all been done with a modicum of respect for the buildings concerned. Bryant Square, by contrast, will graft onto a well-crafted masonry building a nondescript glass-and-steel monstrosity better suited for the 101 corridor in San Mateo County. This neighborhood is populated by old Victorian homes and warehouses with some degree of character, something I would think would be a draw to any potential occupants of the building, and therefore worth preserving or even enhancing.

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2. *Parking and Congestion*

SKS has indicated that they wish to obtain a variance for parking places, indicating that a lack of sufficient amount of on-street parking is merely a nuisance. While this may be a "nuisance" to the occasional visitor, adding more demand to an already strained supply will have a large long-term impact on the quality of life of neighborhood residents. SKS's proposed solution of valet parking in an insufficient underground garage is not enough. Quite simply, the codes that SKS hopes to elude are there for a very good reason, and Bryant Square must provide parking sufficient to meet its demand. Previous developments in the neighborhood have managed to obtain these variances, and the result is a mounting crisis. The line needs to be drawn, and the codes enforced.

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3. *Obstruction of Views*

One of the most egregious shortcomings of the EIR is the implication that building a 65-foot, 5-story building in a 3-story neighborhood is somehow not significant. The Shadow Fan Analysis clearly shows how dozens of households along York and Hampshire Streets will have views of Twin Peaks and Noe Valley restricted. This is significant on a number of fronts – aesthetically, these households (my own included) will lose out on the open expanse of sky at sunset; financially, property values will be lowered by the blot of an eyesore; and what is of greater concern, a precedent will have been set. If SKS is allowed to push up the height of the neighborhood by 30%, how long will it be until the next developer comes along and tries for another 20%? How this single block came to have a 65' zoning allowance is a historical anomaly, but one that should not be allowed to wreck the character of the neighborhood.

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4. *General Process Concerns*

I get the sense from certain facts that SKS was hoping to slip this EIR past the neighborhood. First and foremost is the convenient scheduling of the EIR public comment period over the holidays, when people (like myself, writing this letter on a plane returning from my holiday vacation) tend to be most distracted. Additionally, shortly after the posting of some 10 notices for EIR comment period appeared on the building and on telephone poles, only one notice was left, obscurely hung at a delivery entrance on the 19th street side of the building. As a result, very few people in the neighborhood are aware of the proposed development. It would appear to me that SKS is not interested in community feedback on their project because they are aware of truly negative impacts that Bryant Square, as proposed, will have. Finally, the EIR presents alternatives with either more parking or a lower roof height, but not one with both. This omission biases the conclusions of the report by not presenting the most sensible alternative as a relevant possibility.

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Thank you for the consideration of my concerns. I hope that the Planning Department will give sufficient weight to the welfare of the community as this decision is made, and look forward to the hearing on January 6.

Regards,



David Maltz

cc: Hon. Willie Brown

12/26/99

To: S.F. Planning Dept.
Attention: Dear Environmental Review Officer
RE: Proposed construction variance application

Dear Environmental Review Officer,

I am writing to register my protest to the proposed building construction on Bryant St. between 19th and 20th - in the Mission. I live within 2 blocks of the site. I moved here 2 years ago attracted to the character, diversity and style of the neighborhood. Almost every aspect of the proposed building clash with the existing aesthetic and architecture of this rapidly growing area. Most of us living here are not opposed to the continuing development of the high-tech/craftsman business mix here -- but not if it means setting a new standard for the size and density of buildings allowed. I ask that you give this one more than the usual rubber-stamp approval of the impact to the traffic, height, and architecture on the N.E. Mission.

2a



James Hall
3121 20th St #3
San Francisco, CA 94110

December 16, 1999

Hillary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

Dear Ms. Gitelman,

I have recently become aware of the proposal for development at Bryant Square on Bryant St. between 19th and 20th St. I will be unable to attend the January 6th planning hearing, so I am voicing my concerns in the form of this letter. I am worried about the impact of this project on my neighborhood.

This neighborhood is already seeing more than its share of the city's new construction. None of the current projects (live/work lofts in particular) are really adding much to the neighborhood, in my opinion, but at least they are relatively inoffensive.

The same cannot be said, however, of the project proposed for Bryant Square. The proposed structure is very big and tall and will visually dominate the block and surrounding blocks. This is all the more worrisome because the building is also extremely unattractive and does not fit in with the character of the neighborhood – it's basically a big box apparently designed to maximize usable space with little regard to aesthetics, and I really don't want it in my neighborhood.

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I wonder, also, if the developers and the planning department are really aware of how many people's views and sunlight will be affected. The neighborhood slopes up to the east, which gives the residents just west of Potrero Ave some lovely sunset views. Trading these in for a view of the proposed structure would substantially affect the residents' quality of life as well as property values.

5c
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11a

The parking shortfall is a huge concern. As it is, parking is getting tighter and tighter, and an additional 20+ space deficit would add a substantial burden to the neighborhood. Along with parking problems come traffic congestion and pollution – I've lived in neighborhoods with tight parking before, and I spent a lot of gas money circling the block.

7c

Why can't this project be designed to fit into the neighborhood? Would it be too much to ask for the building to be attractive, to have a little outdoor space, to provide parking for all its users, and to be scaled down in size so as to be more appropriate to the character of its surroundings? As it stands, the whole neighborhood is being asked to subsidize the developers' profit by giving up their quality of life, and that does not seem fair.

2a

Sincerely,



Christina M. Friedrich
2902 21st St.
San Francisco, CA 94110

- Homeowner -

RECEIVED

DEC 21 1999

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

12/19/99

Planning Department

Greetings;

As residents on 20th St., We are appalled by the inappropriateness of the development proposal for the office complex on the corner of Bryant. As a retired Architect and Professor of Architecture I urge you to abort the proposal or significantly reduce its scale and character to relate to its surroundings.

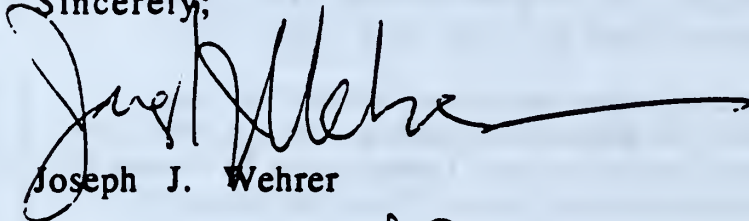
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Whatever is built on this site should include sufficient parking to accommodate its full occupancy without further loading the already aggravated street parking in the neighborhood.

7c

We will work actively to see that any development of this site is sympathetic to the needs of the neighborhood.

Sincerely;



Joseph J. Wehrer



Betty L. Johnson
2705 20th. St.
San Francisco, Ca.
94110

RECEIVED

DEC 21 1999

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

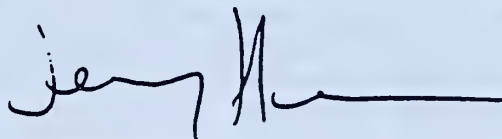
To whom it may concern,

I am writing to express my opposition to the proposed Bryan Square Project on Bryant Street between 19th and 20th. I own a home a block from 20th and Bryant and feel that this project would have a very negative impact on the neighborhood. Parking is already very difficult here during the day because of all of the new high-tech companies that have set up shop here. I am sure that the Bryant Square building, especially if the city allows the developer a parking variance, will only make this worse. San Francisco needs to start taking the issue of parking much more seriously if this city is going to be a livable place in the future. I am also concerned that the proposed building, which would be considerably taller than anything around it, will block views and light from many of the homes in the area.

I do not see the building serving the needs of anyone that calls this neighborhood "home". I doubt that Mission residents will be the ones taking jobs there. The building will add nothing aesthetically to the neighborhood. And the parking problems that it will cause will make no one happy.

I urge you to reject the proposed plans for the Bryan Square office complex.

Sincerely,



Jeremy Hermann
3025 20th Street
San Francisco, CA 94110
415.282.2211

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7c

RECEIVED

DEC 21 1999

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Dr. Tania Ferguson
3025 20th Street
San Francisco, CA 94110
12/19/1999

Environmental Review Officer
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

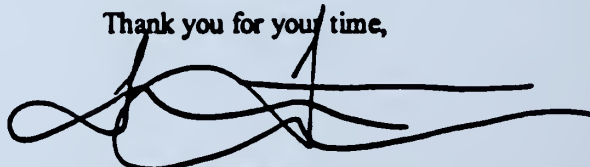
To Whom It May Concern,

I write in reference to the proposed office complex to be located on Bryant Street between 19th and 20th. I have recently moved to this area of town, and am disappointed by the changes occurring and the development that continues to efface the character of the mission district. This building would be yet another example of the poor planning and the lack of respect for the residents of our neighborhood. I am worried first and foremost about the estimated height of the building, currently scheduled to approach 65' thus surpassing even the highest building in the neighborhood by 15 feet. This will destroy the views for many families and local businesses, as well as exert a feeling of corporation to our traditionally small family business sector of San Francisco. Secondly, the effect of an office space of this size will clearly put increased demands on the parking in this part of town, and reportedly the developer is trying to obtain a variance on parking requirements.

That the developer of this structure can state that the project will not have any adverse effect on the neighborhood leads me to believe that the developer has spent no time at all in the Mission. Please help us work towards maintaining the vintage character of our neighborhood; we would like this area not to become a concrete jungle but rather remain interesting, diverse, and friendly. I truly hope you will do the right thing and block the building of Bryan Square.

Please feel free to contact me if there is anything more I can contribute to aid in the decision not to let this building grow.

Thank you for your time,



Tania Ferguson

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5a

12-18-99

Dear Environmental Review Officer,
 San Francisco Planning Department,

Y~~o~~ Department,

DEC 18 1999

CITY & COUNTY OF SF
 DEPT OF PLANNING

Please don't build the proposed structure at 20th/Bryant. We feel it will attract the wrong crowd. A bunch of folks who don't care about the neighborhood. Plus it will block out sunlight for other houses. How many of the offices will be for community based orgs. or Latino groups? Will it be .com Yuppies riding on the current wave of global earthraping capitalism so favored by the corporate MONICA Lewinski wannabees? Please keep this idea as an idea on your webpage forever - cliff

2a

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1a

December 15, 1999

Hillary E. Gitelman
 Environmental Review Officer
 San Francisco Planning Department
 1660 Mission St.
 San Francisco, CA 94103

RECEIVED
 DEC 20 1999
 CITY & COUNTY OF S.F.
 DEPT OF CITY PLANNING

regarding Bryant Square development proposal for lot #4080

Hillary, I've recently reviewed the environmental impact report for the above listed development. I have several concerns; however, I will be out of the country from 12/18/99 - 1/15/2000 so I won't be able to attend the Jan 6 public hearing. Please consider the following concerns and forward them to the appropriate public officials:

my concerns:

I've lived in the neighborhood for over 2 years during which massive development has taken place. So far, most of the projects seem to be on a scale comparable to the natural character of the area (although, many of the so-called "live-work" projects offer little if any architectural character or diversity).

The subject development is different. It is much bulkier and taller than any building around it. It appears to be a transplant from Hacienda Business Park in Pleasanton, CA. I think it will be an eyesore and quite out of place in our neighborhood. The surrounding buildings are 2 to 3 story 50-100 year old brick warehouse buildings or Edwardian flats. There's an authentic western flavor in our neighborhood. We love that about it. Many of the buildings have barn doors and holsts. The painted brick signage from years gone by can still be seen here.

While I'm not opposed to having more office space in our neighborhood, I am opposed to introducing overwhelming large new buildings with little architectural character and which ignore the pedestrian sidewalk level. This development looks like a 100% lot coverage parking garage crowned with a suburban office building that's so tall it will cast morning to noon shade most of the year on the streets below it and block the hill and city view of the residences around it even from the upper most floors.

Furthermore, according to the EIR, Bryant Square is underparked by over 20 spaces. Our neighborhood has so many workers moving in to older buildings which offer no off-street parking that the impact on parking from Bryant Square could make it difficult if not impossible to park in our neighborhood.

Please reconsider the Bryant Square proposal. Scale it down. Give it a western architectural flavor. Make sure it has plenty of off street parking. Step it back from the corner. Make it friendlier on the sidewalk pedestrian level. Try to limit the number of city and hill views blocked.

Thank you,


 Miguel Nelson
 2902 21st Street
 San Francisco, CA 94110
 tel: 415 377 7983

(HOMEOWNER)

5d
 4d
 4e

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CALIFORNIA
HISTORICAL
RESOURCES
INFORMATION
SYSTEM



ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE
HUMBOLDT
LAKE

MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCO

SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, California 94928-3609
Tel: 707.664.2494 • Fax: 707.664.3947
E-mail: nwic@sonoma.edu

19 November 1999

NWIC File No.: 99-SF-52E

Hillary E. Gitelman
Environmental Officer
City & County of San Francisco
Planning Department
1660 Mission Street
San Francisco, CA 94104

re: 98.635E, Bryant Square

Dear Ms. Gitelman:

Thank you for submitting the above referenced document for my review. I have no additional comments at this time. I would also like to thank you for your continued concern for our cultural heritage.

Sincerely,

A handwritten signature in cursive script that reads "Leigh Jordan".

Leigh Jordan
Coordinator

6a

RECEIVED AT CPC HEARING 1-6-2000

(NAVAGANT)

98.6.5E

To: San Francisco Planning Department
RE: Bryant Square Project

I am alarmed by the ~~proposed~~ 2-story building proposed for the Southwest corner of 19th Street & York. This intersection adjoining Bryant Square is unique and historic. York Street is unusually wide along these two blocks, creating an open, central feeling. Restored landmark Victorians stand at the Northeast and Southeast corners. The 2-story industrial brick building on the Northwest corner is well maintained and exhibits a classic facade typical of fine industrial buildings of the mid-1800's. The restored Mill Building on the Southwest corner steps back from 19th Street to accommodate a small 1-story wooden building (presently clad in plywood and painted to resemble the adjoining brick buildings).

The proposal to replace that small 1-story building with a bulky 2-story, undistinguished structure (nearly 4x the size) would scar and transform this intersection in a tragic way, hiding the end of the Mill Building (windows & historic signage) and much of the brick Remler Building on 19th & Bryant. This structure would sterilize, commercialize and overpower the delicate residential - industrial texture of the area.

If this parcel cannot be an open/green area - or at least landscaped (much needed) parking, I believe a 1-story space either utilizing the existing structure or expressing a compatible contemporary architectural statement would be more suitable.



John Reamer

John Reamer
Design/Illustration
639 York Street
San Francisco 94110
Telephone: 282-0582

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27a

115100

RECEIVED AT CPC HEARING 1-6-2000

(NAVARRE)
98 65515

in which it may conceal.

I am writing to express concern over the proposed Bryant Square project.

1) Its height will make it overshadow all other buildings in the vicinity. It is entirely inappropriate for the neighborhood.

5d

2) its architecture DOES NOT fit into the other warehouse-type buildings & family dwellings in the neighborhood. It will draw attention to itself & be an eyesore.

5a

3) There is already a lack of parking in the area. I'm concerned about the increased traffic congestion & street parking ~~space~~ this new facility will put on the area.

7c

Sincerely,

MILLIE GILL

2507 Bryant St.

(415) 282-2276

To: Environmental Review Officer
 San Francisco Planning Dept
 1660 Mission St, SF CA 94103

From: Kim NIES
 3025 20th St, B
 SF, CA 94110

RECEIVED AT CPC HEARING 1-1-2010
 (NAVARRETT)
 98 6:51

RE: BRYANT SQUARE

TO WHOM IT MAY CONCERN,

The proposed Bryant Square building is totally inappropriate for the neighborhood. No parking variance should be granted. Parking is already a problem and this building would make it completely problematic. Beyond the parking problem the style would be an unsightly addition and the ^{proposed} height of the building would not only →

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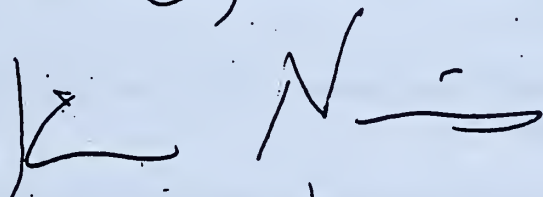
block views, but also create
unpleasant lack of light
for neighbors.

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Please do not grant
Bryant Square any variance
in height or parking.

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4c
2b

Sincerely,



Kim Nieg
SF Resident

1-5-2000

RECEIVED AT OPC HEARING

(NAVARRETT)

Delivered Via Courier

January 3, 2000

Ms. Hillary E. Gitelman
 Environmental Review Officer
 San Francisco Planning Department
 1660 Mission Street
 San Francisco, CA 94103

Re: Response to Bryant Square Project and DEIR Report (2101 and 2125-65 Bryant Street, 700 and 750 York Street, and 2717 - 19th Street).

Dear Ms. Gitelman,

Please accept this letter as my commentary on the above-referenced proposed project and DEIR report. I have read this report in entirety and I have the following concerns and misgivings about the project and the report which I feel need further consideration:

1. The project exacerbates the already critical problem of parking capacity. I personally must park my car on the street and so face this problem daily, along with many of my neighbors. The DEIR report highlights this problem! 7c
2. The project exceeds the size and bulk of all other structures in the neighborhood, as well as zoning ordinances. Why is this necessary? Furthermore, it does not conform to the prevailing style, height, and mass of structures in the neighborhood, thereby creating an eyesore that belongs in an office park! 4c
5a
3. The scenic views of the neighborhood of Twin Peaks and downtown San Francisco would be significantly affected by this project. 5c
4. The need for multi-media and retail commercial space is already served through Potrero Center and all the new live-work projects completed or under completion in the neighborhood. Hundreds of live-work units have been added to the neighborhood recently. Do we really need more of this kind of utility? Why does the DEIR report not go reflect this other development and expansion of retail services? 17a
5. Inadequate consideration has been given to the fact that the neighborhood relies on a public transportation system that is already inadequate and overburdened. As I commute daily to the downtown area by MUNI, I can attest to the fact that this represents a significant problem. The 9 San Bruno is the only neighborhood bus line that goes to and from the financial district and is considered one of the worst bus lines in the City! 7p
6. The issue of the neighborhood traffic flow. I disagree with the DEIR on their findings on this matter. There is already much congestion on the streets and sidewalks in the area during major commute hours which could only be significantly increased by this project. 7m
7r

7. The addition to the historic building at 2101 Bryant Street fails to preserve its aesthetic element and value to the neighborhood. Why is this addition necessary? Due to the scope of this project, construction noise and vibration from excavation to our neighborhood would be excessive and disruptive for a very long time, solely based on the scope of this massive redevelopment.
8. The entire project violates the design and mass of all other buildings in the area. This is acknowledged in the DEIR report. Unfortunately, the design element of the project would only be appropriate in an office park, preferably outside of the City.

In conclusion, I favor a down-scaling of this project from its current size. I cannot find any grounds justifying the scope of this project, other than an excessive profit motive. Also, I favor a complete re-design of the aesthetic design elements of the project to conform to the existing neighborhood structures. As it stands, This project is a pioneering effort that is out of touch with our neighborhood and the Mission District.

I hope the above comments and observations are given careful consideration.

Yours very truly,



Katherine E. Shlaudeman
Attorney
and Resident
2603 – 19th Street
San Francisco, CA 94110
415-824-2817

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Hand Delivered on 1/6/99.

RECEIVED AT OPC MEETING 1-6-2000
Mark

January 4, 2000

Ms. Hillary E. Gitelman
 Environmental Review Officer,
 San Francisco Planning Department
 1660 Mission Street
 San Francisco, CA 94103

Re: Response to Bryant Square Project DEIR Report (2101 and 2125-65 Bryant Street, 700 and 750 York Street, and 2717 – 19th Street)

Dear Ms. Gitelman,

Please accept this letter as my response to the DEIR report referenced above. I have carefully read this report in entirety and I have the following concerns and misgivings about the scope of this report, as well as general comments about the proposed project.

As follows:

A. The report does not accurately address overall effects of recent development in a neighborhood (our neighborhood) saturated with new development of various commercial and live-work projects which have either recently been completed, converted or are in the process of being completed. This projects are listed below. Further, it does not address how these other new developments may have already have already met the current and future demand for the so-called multi-media, commercial needs of the city, and since this category of expansion has already spilled over from the South of Market and Potrero Hill Neighborhoods.. It is my understanding from various owners, that many of these units are in fact already being used for this multi-media purpose.

24 Units at Hampshire and 18th Street. B. New commercial units at 19th and Harrison Streets.
 C. 6 Units and 630 Hampshire Street. D. 12 Units at Harrison between 17th and 18th Streets.
 E. 35 Units at 720 York Street with only 19 parking places. F. 18 Unit Conversion at 20 and Florida Streets with no Parking! 18 Units at 725 Florida Street, currently undergoing completion. 28 Units at 17th Street, taking up the entire block between Bryant and York

B. The report admits and acknowledges a major shortfall in parking spaces already at a negative for our neighborhood needs, and does not offer solution for this problem. The spaces created inside the building do not come close to providing enough space to offset the increase in traffic and people who will dwell inside the building. With the already extensive development of the neighborhood, a complete study of the entire neighborhood parking and public transportation needs have to be addressed and studied in great detail!

17a

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 17a

C.The new mass and height of this project would erect a wall between several residential neighborhoods, which harmoniously co-exist on each and every side of the proposed project. The aesthetics of the proposed project are in total conflict with the current existing structures – which the DEIR acknowledges - and does not fit into the Urban Design Element of the San Francisco General Plan Policies by violating Objectives 1, 2, and 3. Please review the photographs of all surrounding structures, there is nothing else like this in our neighborhood! The project, in its current form, basically creates a downtown structure in the Mission District, thereby clashing tremendously with the San Francisco neighborhood design mandates! From what we know, there are numerous new downtown structures being erected that are already adding this kind of office/multi-media space expansion, at a frenzied pace. Therefore, why do we need this type of space and expansion in the Mission District?

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D.Although the DEIR report concludes – Under Visual Quality and Shadows section that there is no significant impact of scenic views and vista from a public area, I challenge this conclusion entirely for the following reasons: Downtown views from 20th and Bryant Streets would be substantially impacted and obstructed to all foot, bus, and auto traffic. Twin peaks views from Potrero Street (a major through street of San Francisco, coming from the south), Hampshire Street, and York Street looking to the west, including a sweeping vista of Twin Peaks and the setting sun, would be lost and gone forever. The next/or final report needs accurate photographs from all of these streets and street corners. The ones included in the DEIR are wholly inadequate!

5c

E. The projected use of the project would entirely change the atmosphere on a long-established and peaceful neighborhood by making it into a mega-commercial center. For this reason, the City needs to commission a completely independent study of their own to evaluate the impact of the entirety of development of this our neighborhood, taking all factors affecting the neighborhood and this development project into consideration!!! At this point, we cannot just look at one, isolated development, as is the case with this DEIR.

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F.The zoning and land use exceptions for height and bulk required for this project serves no practical purpose (other than to maximize profits for the developers?). The developer consistently rejects lower bulk alternatives without giving or including the financial details of these patent rejections, as related to their profitability!

4c

1c

G.The impact of the noise of excavation and construction would be massive and completely disruptive to the peaceful and established neighborhood! Why should we have to put up with this massive disruption just to maximize the scale of this massive project! How would such major excavation affect settlement of surrounding properties. What sort of guarantees do we have. Maybe we need to have a completely independent, outside engineering evaluation of the impact of excavation.

8

12

H.Traffic and added congestion to the neighborhood. The scope and mass of this project are so great, the entire nature of the neighborhood would be entirely changed during work hours, regardless of what the DEIR says, because it adds so many new people and activities to the neighborhood, affecting every neighbors quite enjoyment of the existing surroundings. Further and more accurate investigation needs to be made relative to this point.

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I. The report mentions the MUNI and public transportation, but does not mention if these are adequate to support this development, or all other recent developments. I have personal knowledge from my own experience, and the experience voiced at neighborhood meetings that the public bus lines are insufficient to even meet current demand, are untimely, and are often over-filled by the time they reach our neighborhood!

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J. Retail needs have been met by the complete remodel of the Potrero Center and various older establishments in the area in mixed-use and other commercial buildings. Often, there have been vacancies in the neighborhood, including the Potrero center, which have sat a long time before being filled! Therefore, the proposed retail space is redundant, excessive, and completely unnecessary. More importantly, these factors are not properly addressed in the DEIR.

4f

K. Displacement of existing affordable business space and square footage for extremely pricey office space. The report fails to mention the disposition of existing tenants and impact of ever-decreasing inexpensive, commercial/light manufacturing space. There is no question in the mind of anyone in San Francisco, that small, inexpensive commercial and light manufacturing space is being wiped out at an alarming pace (I have been sent, the statistics by the Coalition for Jobs, Arts, and Housing).

10b

In summary, this project is out of touch with the neighborhood in most ways, and is excessive in every aspect and belongs in an office complex in San Jose, and not in a cherished and well-established neighborhood of San Francisco. The office space and retail space demands have already been met through many, many recent projects. Affordable housing and work-spaces are what is really needed at this time in San Francisco and in this project. To insure proper urban planning and development, it is time for a complete and thorough, independently commissioned study (EIR?) of all recent and future development in our neighborhood, addressing all new and undergoing projects in their entirety, as opposed to one isolated project.

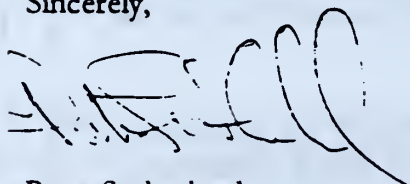
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With so many unusual design elements and disharmonious neighborhood factors, this project does not merit all the needed variances in size, mass, style, etc., that are necessary and called-for by the developer, but at a enormous cost and sacrifice to the neighborhood!

2a

Sincerely,



Peter Sutherland
2601 -19th Street
San Francisco, CA
415/282-2220

• COWS • 12/30/99

Proposed 5 story building
on block of Bryant x 1st



Totally inappropriate for
neighborhood!!!

too massive!!!

too tall!!!

out of character - we live
here - this is huge!!!

Parking is serious problem

No waivers - Please, please

Reconsider: This will make
the whole area much less

livable. Mary Bennett

POMERANATE BOX 6099 ROINERT PARK CA 94027

Environmental Review
S.F. Planning Department

1660 Mission St.

San Francisco, CA

94103

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4e

2b

© 1993 David Lorenz Winston

2641 20th Street

826-6160

94110

M. Bennett 2641 20th Street 94110



HAWAII PRINCE HOTEL

W A I K I K I

January 3, 2000

Environmental Permit Officer
 San Francisco Planning Department
 1660 Mission Street
 San Francisco, Ca. 94103

Re: Bryant Square Variance

Dear Sir or Madam;

This letter is in regards to the office building proposed for 20th and Bryant Streets. As a legal assistant for an environmental law firm, I am away for the week in Hawaii, but am familiar with Environmental Impact Reports and the review process. I felt that the issue of a height variance in this matter demanded that I write to you.

I have been a resident of this neighborhood for 12 years and reside across the street from the proposed building (at 2811 20th Street). I vigorously oppose the granting of any variance for the building as proposed. I strongly oppose any height variance.

We recently added a third floor to our home at great expense. We were required to maintain the character of the neighborhood by limiting the height of our residence. I believe all the buildings in the area should also be required to limit their height as required by the zoning laws and designations.

Thank you for your attention to this matter.

Mary Bobbitt

Hawaii Prince Hotel, 100 Holoana Street, Honolulu, Hawaii 96815

Telephone: (808) 956-1111 Facsimile: (808) 916-0811

© PRINCE HOTEL

2811 20th St
 San Francisco 94110
 415-824-6149

4d

4e

January 5, 1999

Alan Lyons
2751 Bryant Street
San Francisco, CA 94110

The Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

RECEIVED

JAN 06 2000

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

Subject: Bryant Square Development Project Draft Environmental Impact Report 98.635E

To Whom It May Concern:

I am writing in reference to the Draft Environmental Impact Report (DEIR) for the so-called Bryant Square development project, proposed for the block bounded by 19th, Bryant, 20th, and York Streets in San Francisco. I expect the project sponsor and/or the San Francisco Planning Commission (Commission) to respond to these comments thoroughly and in good faith, with the comments and responses incorporated into the Final EIR.

3b

After reading the DEIR and as a city native and long-time area resident, let me say that the proposed project is unacceptable. It is a textbook example of the kind of reckless and irresponsible development that threatens San Francisco's neighborhoods. I am in favor of the "No Project Alternative," as the project involves the elimination of vital and beneficial existing uses, as well as the erection of a massive replacement structure totally at odds with the existing scale and aesthetic quality of the neighborhood. *The block is in no way blighted or disused, and no compelling justification in terms of the public good exists for the proposed demolitions and redevelopment.* Historically, redevelopment schemes involving Planned Unit Development Approvals and demolitions have ruined large sections of San Francisco. We cannot let this flawed approach to development inflict further damage. The project as proposed would set a dangerous precedent in the northeast Mission, where development is already seriously pressuring long-term residents and small businesses and eroding the neighborhood's distinctive character.

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This having been said, it is also my belief that the *DEIR is flawed and inadequate, and that it does not sufficiently inform the Commission or the interested public of the project's impacts on the neighborhood so that sound decisions can be made about how to proceed.* In fact, the presentation in the DEIR is a very persuasive argument for summary rejection of the project. This letter of comment will spell out at least some of these inadequacies.

3a

3b

FAILURE OF THE DEIR TO PROVIDE EMAIL INFORMATION FOR PUBLIC COMMENTS

The environmental review officer for this project informed me that valid comments on the document could be sent to the Planning Department via email, as well as delivered as hard copy. She gave me the following addresses: hillary_gitelman@ci.sf.ca.us

joy.navarete@ci.sf.ca.us. This information is not included in the DEIR. This omission has denied the public an important means of exercising its right to participate in the environmental review process specified under the California Environmental Quality Act. At minimum, a supplement or amendment to the DEIR that provides email contact information needs to be issued and the comment period extended appropriately. If the Commission decides that the project sponsor needs to resubmit a revised DEIR, it should also include this information. (This letter of comment is being submitted both as email and hard copy.)

3a
3b

CITY ACCOMMODATING THE DEVELOPER

As a general comment, the project sponsor should not be granted any Planned Unit Development Approval, parking variance, or any other permit for this project as proposed. If the Commission allows the project to proceed after a suitable revised DEIR is submitted (i.e., does not accept the No Project Alternative), variances and other accommodations should only be considered after the project sponsor adequately addresses the important issues described below.

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LACK OF POPULATION/SOCIOECONOMIC IMPACT ANALYSIS

The document does not address the socioeconomic impacts of the proposed project. Such a section would have to conclude that the demolition of the 2125 Bryant Street constitutes a significant unavoidable impact. Such a conclusion would alone be grounds for the Commission's rejection of the project. I consider it likely that the project sponsors deliberately chose to omit any discussion of the socioeconomic impacts for this reason, and may indicate bad faith on their part. These impacts are discussed cursorily under Population in the Initial Study, appended to the DEIR, and dismissed. In fact, such an analysis would cut to the very core of why this project is unacceptable. Developers cannot be allowed to buy up productive properties in the city, raise them to the ground, and redevelop them as they see fit. It is up to the Commission to see that this doesn't occur.

10b

Displacement. The Initial Study cavalierly dismisses as insignificant the impacts on the people working and living in the 2125 Bryant building. These impacts deserve careful consideration and mitigation. The proposed project involves the demolition of a large fully utilized multiuse building, and the necessary eviction of its current tenants, some of whom have already been denied new leases and suffered displacement. The DEIR describes (page 1-1 and elsewhere) the project as "demolishing about 34,000 square feet of offices, light industrial, and arts-related activities." Unless the project sponsors propose to offer to those displaced equivalent facilities at equivalent rents in the new development, this displacement could reasonably be considered a significant impact. For this reason, *the DEIR should be revised to include a socioeconomic impact analysis, and at least oblige the project sponsors to accommodate those evicted.* In all likelihood, the demolition and displacement will constitute a significant unavoidable adverse impact and be grounds for the Commission's rejection of the project. In addition, "arts-related" uses are absolutely critical to the vitality, diversity, and overall distinctiveness of the area and should be given special consideration. The project does not provide for these beneficial uses.

Lack of Housing Units in Proposed Development/Potential Neighborhood Cost of Living Impacts. The proposed development includes office, retail, and light industrial uses. It does not include any housing. Affordable housing is a pressing need in San Francisco, especially in the Mission, and development of the Bryant Street site presents an opportunity to address this need. The proposed project does not and will only exacerbate the problem. Other questions that need to be answered in a revised DEIR: How will the project affect neighborhood rents, property taxes, and the ability of existing neighborhood businesses to endure? How much will the project sponsor charge for tenancy in the new building, and how do these rates compare to existing rents for these uses in the project vicinity? Are any chain stores planned as tenants? In any case, they should be banned from the project site and vicinity.

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INADEQUATE VISUAL IMPACTS ANALYSIS

While claiming that it will have no significant visual impact, the DEIR repeatedly acknowledges that the new Bryant building will be “more massive” (page 3-10 and elsewhere) than the existing building to be destroyed and as adding a “horizontal element to the area.” This cryptic reference seems to be a euphemistic acknowledgement of the new building’s utter incompatibility with its surroundings. As the term “massive” is a function of surfeits in both the vertical and horizontal, let us also be reminded of the new building’s significant five-story “vertical element.” Alas, we need to see the project for what it is, not what the developers pretend it to be.

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The project as proposed, is plainly too big for the setting, and has an unmistakable suburban industrial park look totally at odds with the neighborhood. The city deserves better. A developer with any imagination, much less any sensitivity or clue about the organic function of the neighborhood, would have put forward a different design. Not only will its bulk absolutely transform the pedestrian-friendly block into a shadowed no-man’s land, but the lack of any aesthetic tie to the surrounding older industrial buildings and Victorian-era homes, particularly those directly across Bryant and 20th, is egregious. The project will at the very least establish a gross aesthetic imbalance between the east and west sides of Bryant and the north and south sides of York. This constitutes a significant impact that requires mitigation.

In addition, because Bryant Street doglegs at its intersection with 20th, views down Bryant toward the project site from the south from as far away as Cesar Chavez Street will feature the imposing five-story concrete bulk of the new building looming above the middle of the street. Its obstructive presence from this southern vantagepoint will block existing views, and present a gross aesthetic incompatibility with the low-rise wood structures along the length of the street. The DEIR overlooked this visual impact, an analysis and illustration of which needs to be included in a revised DEIR

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The Initial Study states with no small amount of arrogance that the aesthetic impacts of the development are included in the body of the DEIR for informational purposes only, the implication being that the project sponsors were under no obligation to the Commission or the public to even reveal the design of the buildings proposed. This is an insult to the people who live and work in the project vicinity and who the proposed development will most affect. In fact, the developer’s benevolent offering reveals a project wholly out of character with and damaging to the community.

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The statement in the DEIR (page 1-4 and elsewhere) that the “proposed new building... would be compatible with the scale, form, and fenestration pattern of the adjacent historic building” is inaccurate, subjective, biased in favor of the project, and is clearly contradicted by the photos and diagrams the document provides in Section 3 and elsewhere. Figure 12, page 3-12, shows a 4-story vertical masonry and concrete wall, with a stepped back 5th story, extending down the block from 20th to 19th Streets and east on 20th toward York, replacing a varied frontage that includes a substantial area of open space on the corner of Bryant and 20th. The fenestration does not match up or comport with that of the brick building on the corner of Bryant and 19th, and the building’s height, at five stories, exceeds existing maximum frontage heights of two and three stories. Any new replacement building should preserve the open quality of the frontage. In regard to this impact, we may look at the Pac Bell Building on Capp Street between 25th and 26th for a lesson in how an incompatible building scale can devastate a neighborhood block. *We deserve a revised DEIR that deals with the project’s visual impacts thoroughly and objectively.*

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LACK OF PUBLIC OPEN SPACE

While the project provides a small amount of regulated-access interior open space, the planning department should insist that public open space be provided on the Bryant and/or 20th Street frontages, to replicate and enhance the block’s existing character. The DEIR provides no alternative in section 6 that includes such open space, and should be revised accordingly. *The DEIR should be revised to include public open space on the Bryant and 20th Street frontages, preferably in the form of a public plaza on the corner of 20th and Bryant, as an alternative.* Even though this corner is not currently public open space, it is no less open and an essential part of the block’s open character. The interior open space proposed is obviously perfunctory and will be access limited and effectively exclusive use.

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REQUIRE SETBACK/STEPPED BACK ALTERNATIVES

Setting back the base of the building and further stepping back its facade could further ameliorate the “massiveness” of the Bryant Street frontage. These are obvious approaches to making new urban development compatible with existing building scales.

The fact that the project sponsors failed to include any setback/stepped back alternative in the DEIR demonstrates their disregard of the neighborhood in favor of maximizing profitable square footages. A set back would widen the sidewalk, make the new building less imposing, and allow for pedestrian amenities, like benches and trees. The step back element could aesthetically allude to the stepped Dutch style of the adjacent historic Mills Building, reduce shadow impacts to the residents on the west side of Bryant, as well as wind impacts along Bryant. Again, no alternative including a setback or stepped back Bryant Street frontage of either the proposed project or the reduced height alternative is considered in section 6, and no analysis of wind impacts from a 5-story vertical wall on Bryant Street is provided. *The DEIR should be revised to include setback/stepped back alternatives for the Bryant and 20th Street frontages, as well as shadow and wind analyses of all scenarios.*

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UNACCEPTABLE MILLS BUILDING IMPACTS

The DEIR also describes the new 2125 Bryant building as obscuring the historic Mills Building from two vantagepoints. In regard to the Mills Building, Figures 12 and 13, page 3-13, show the proposed Bryant Street building almost totally obscuring its west façade, and the building on the corner of York and 19th to totally obscuring the Dutch style stepped façade of the building's north end. This design feature is rare in San Francisco, a distinctive neighborhood feature, and should by all means remain visible. The DEIR acknowledges this impact but does not consider it significant. It is significant. A revised DEIR should inventory the buildings in San Francisco of this style then conclude whether or not obscuring this almost unique building is significant. ***The building at the corner of 19th and York should remain one story and the open space on the corner of Bryant and 20th should become public open space with existing views of the Mills Building preserved.***

In summary, the DEIR is inadequate and should be revised to include alternatives that preserve the open character of the Bryant/20th Street frontage, the visibility of the Mills Building, and address the neighborhood's pressing need for public open space.

INADEQUATE MITIGATION OF TRAFFIC IN THE NEIGHBORHOOD

Outer Bryant Street is a neighborhood street of mostly older homes and apartment buildings that suffers from too much commercial and commuter through traffic under existing conditions. With increasing commercial development in the immediate vicinity of the proposed project, general measures need to be taken to route more traffic to and from the US 101 on and off ramp at Chavez, onto Potrero Avenue, which is a major thoroughfare with signals and substantial carrying capacity. The project sponsors should do their part. For example, they should be required to include signage at the exits of the project's parking garage instructing drivers to use Potrero Avenue for US 101 access. Similarly, signage should be installed near the US 101 off-ramp directing through traffic to Potrero. Some of the commuters to and from the project will use York and Bryant as alternatives to Potrero during peak periods. These two streets are neighborhood streets and will only suffer from more traffic. ***The DEIR needs to be revised to include measures to prevent added trips on York and Bryant.*** The Commission should insist that the Department of Parking and Traffic implement controls on commuter and commercial traffic on residential streets in the project vicinity.

The mitigation measure for limiting construction-related traffic on residential streets (page 4-2) should be made more specific. ***The project sponsor should be required to submit a binding Construction Vehicle Trip Plan that specifies number of trips anticipated, trip timing, destinations, and routes.*** The project would involve significant excavation and numerous heavy truck trips to and from the site over a long period, and a plan of this type is absolutely justified. A revised DEIR should include such a plan as a mitigation measure for any redevelopment of the property.

If on-street parking needs to be metered to accommodate short-term visits, exemptions should be available to those living in the area. The DEIR offers no adequate justification for a parking variance and no accommodation for residential on-street parking. ***The project should (1) conform to city on-site parking requirements and not be granted a***

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variance for the short fall, and (2) exempt residential on-street parking from new meter controls.

A note: the DEIR mentions an average increase of 5 seconds for vehicle delays at 23rd and Potrero. As an average, this is meaningless, as one vehicle in ten could experience a 50-second delay, or one in a hundred could experience a 500-second delay, and we would have the same seemingly small figure. The DEIR needs to be revised to further detail delays.

Because of the increasing use of the 27 Bryant, a diesel bus Muni line, attributable to development along the Bryant Street corridor to which the project would contribute, the planning department should recommend that it be changed to electrified trolley bus to mitigate increased noise and air quality impacts.

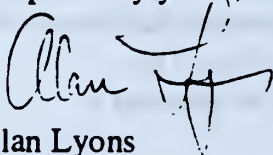
CONCLUSION

The project sponsor's stated goals (page 1-12 and elsewhere) to provide modern, safe, and accessible office space to the information technology industry, to provide attractive open space, and to contribute to the city's employment and tax base, are at best, incomplete, and at worst disingenuous and a smoke screen. Don't be fooled! The real goal, though unstated, is evident throughout the report, namely, the project sponsor's self-interested desire to capitalize on the city's booming real estate and multimedia markets while minimizing any effort to improve the community. This is made apparent in (1) the project's elimination of beneficial uses through demolition, (2) its maximization of income square footage at the expense of compatibilities of scale, (3) its cookie cutter design, (4) its emphasis on automobile transit, (5) its perfunctory open space, and (5) the project sponsor's unbelievable claim that this monstrous development will have no adverse population and visual quality impacts.

(It's pertinent to note that numerous *vacant* blocks exist in the city's SOMA that could accommodate a development of this nature while satisfying the developer's goals, without demolitions, visual insults, and onerous traffic impacts. The Commission should require the project sponsor to submit evidence that the proposed development cannot proceed on other available properties before it approves any redevelopment of the proposed site.)

The proposed Bryant Square development is no good for San Francisco. The sensible course of action is for the Commission to disallow the demolition of the existing 2125 Bryant building to stop this reckless large-scale development in its tracks. Short of this, I urge the Commission, at the very least, to require the project sponsor to substantially revise its planned development so that it adequately addresses the issues outlined in this letter and the other comments received, and submit a revised DEIR.

Respectfully yours,



Alan Lyons

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Cc.

Willie Brown, Mayor of San Francisco

Tom Ammiano, President, San Francisco Board of Supervisors

Michael Burns, Director, MUNI

Stewart Sunshine, Director, Department of Parking and Traffic

Sue Bierman, Member, San Francisco Board of Supervisors

Michael Yaki, Member, San Francisco Board of Supervisors

Leslie Katz, Member, San Francisco Board of Supervisors

Mark Leno, Member, San Francisco Board of Supervisors

Gavin Newsom, Member, San Francisco Board of Supervisors

Jul Niemier
2811 20th Street
San Francisco, CA 94110 USA
415 824 6149/ fax 824 6139

4 January 2000

To: Environmental Review Officer, San Francisco Planning Dept.

Re: Opposition to variance on building height and parking for proposed Bryant Square Development.

As a Builder/ Developer, I am not opposed to the Bryant Square people building out their property. I have had Planning Dept. issues go variance hearings too. Such was the case with the permit process on my house just across 20th Street. But these were small, "use" matters. Changing height limits and parking requirements would be a major departure from new construction limitations that I and all the other nearby builders have had to design with.

Please, let's not get into law suits and charges of corruption over the building laws as they exist . The restrictions we have today is the sensible compromise.

Sincerely,


Jul Niemier

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RECEIVED
JAN 05 2009
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Thompson & Associates

San Francisco Planning Dept.
Environmental Review Officer
1660 Mission Street
San Francisco, CA 94103

Dear Staff Person:

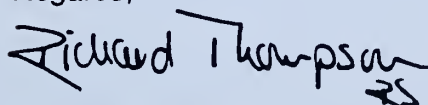
I am writing to you as a 21 year homeowner who lives and works at 2376 Bryant Street. I am a registered California Architect and have conducted my practice from the above address since 1990.

I have many concerns regarding the proposed "Bryant Square" project currently under review by the Planning Department. Regrettably I will not be able to voice these concerns in person due to other commitments so this letter will have to serve in my stead. These are my concerns:

- **Parking** - The developer has requested a reduction in the required parking count. As you know, the neighborhood is experiencing significant gentrification with new businesses and live-work lofts springing up everywhere. Parking is in short supply particularly around the 20th and Bryant intersection. What possible justification would warrant a reduction in this project's off street parking obligation? 2b
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- **Overall scale of the Building** - The building at 65 feet in height will be 1 1/2 stories taller than any other structure along Bryant Street. The overall size of the structure is further exaggerated by the long unbroken window and wall treatments. Clearly this structure is scaled identically to its cousins in suburban office parks designed to be seen at 70 miles per hour from an adjacent freeway. 5d
- **Context** - In almost every way this building is out of context with other neighboring buildings. Its choice of materials does little to respect the historic brick buildings sited directly to the north and east. Window treatment bears no relationship to either the old commercial buildings or the Victorian apartment complexes south of 20th Street. The buildings ground floor streetscape facade presents hundreds of feet of blank opaque walls without a single shop or inviting street level cafe; again placing this structure out of context with a pedestrian friendly environment. 5a

Bryant Square has had an impressive beginning with the restoration of the Old Mill Building and the ongoing remodeling of the old McKesson mayonnaise plant will further enrich the neighborhood's vitality and pedestrian environment. There is a wonderful opportunity here to continue this renaissance of the neighborhood with a building sensitive to the neighborhood's roots and character. 2a

Regards,



Richard Thompson

RECEIVED

January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

JAN 05 2000
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

Re: Draft EIR 98.635E

Dear Ms. Gitelman,

It has come to my attention that a planned commercial project, "Bryant Square", could house 500 to 600 people while only providing 300 parking spaces. If this project proceeds at its location on Bryant Street between 19th & 20th Streets, it will adversely effect the already tight parking situation in the adjacent area.

A commercial entity of this size needs to provide adequate parking to accommodate its tenants as well as the people and cars that will come to the area to do business with the project's tenants.

It is my understanding that new construction in The City requires adequate parking. This project does not provide the number of parking spaces required for the number of people that will occupy and do business at this location. The obvious solution would be the construction of additional parking within this complex.

Why couldn't the developer build additional parking that could be used by the public? It seems feasible to build a commercial building with public parking. There should be a benefit to the community at large (grossly needed parking spaces) if a project of this size is granted a building permit.

Please do not issue a permit until this parking issue is resolved. This should apply not only to this project, but to any project of such magnitude.

Thank you for taking my concerns into consideration.

Sincerely,

Jessie C. Francisco
Jessie Francisco
3117 - 20th Street

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January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Draft EIR 98.635E

Dear Ms. Gitelman,

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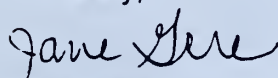
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Please do not issue a permit until this parking issue is resolved. This should apply not only to this project, but to any project of such magnitude.

Thank you for taking my concerns into consideration.

Sincerely,



Jane Gere
3117 - 20th Street

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January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Draft EIR 98.635E

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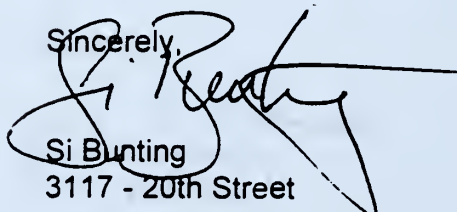
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Thank you for taking my concerns into consideration.

Sincerely,


Si Bunting
3117 - 20th Street

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January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Draft EIR 98.635E

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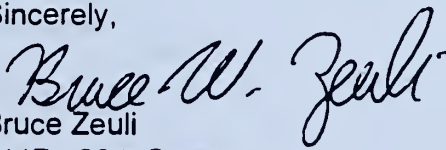
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Thank you for taking my concerns into consideration.

Sincerely,


Bruce Zeuli
3117 - 20th Street

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January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Draft EIR 98.635E

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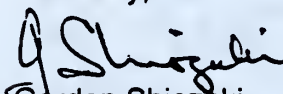
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Thank you for taking my concerns into consideration.

Sincerely,


Gordon Shiozaki
3117 - 20th Street

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January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

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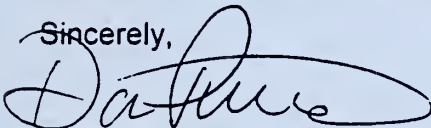
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Thank you for taking my concerns into consideration.

Sincerely,



Donald Parrillo
3117 - 20th Street

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January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Draft EIR 98.635E

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Please do not issue a permit until this parking issue is resolved. This should apply not only to this project, but to any project of such magnitude.

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Thank you for taking my concerns into consideration.

Sincerely,



Stanley Ho
3117 - 20th Street

January 4, 2000

Environmental Review Officer
San Francisco Planning Commission
1660 Mission St.
San Francisco, CA 94103

Re: Draft Environmental Impact Report 98.635E

Dear Review Officer:

I am a concerned homeowner writing to oppose the "Bryant Square" building proposed at the corner of 19th and Bryant in my mission neighborhood. While the new "media gulch" houses both residents and small media companies, crossing the line into major commercial real estate will greatly alter the personality of the neighborhood.

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I feel strongly that this will make parking near my home even more difficult than it already is, and such a large commercial building will clash greatly with the pleasant, mostly residential neighborhood. I should also mention that such a large building will greatly affect the homes directly near it: blocking wonderful mission area sunshine from their bedrooms and kitchens as residents get up and make their morning coffee.


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It's a sad thought.

Thank you for your consideration
Sincerely,



Liz Gazzano
828 Alabama Street
San Francisco, CA 94110

RECEIVED
JAN 04 2000
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

2622 19th Street
San Francisco, CA 94110-2123

December 31, 1999

Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Subject: Proposed office complex at Bryant & 19th/20th Streets

Dear Environmental Review Officer,

We are residents in the neighborhood of the proposed Bryant Square office complex development and oppose its construction. Much of the surrounding neighborhood is residential – especially to the east where single and two family dwellings predominate. The proposed commercial structure is entirely out of scale – i.e., too large – and out of character with the surrounding neighborhood and that will cause irreparable environmental harm to this neighborhood.

The proposed 5 story, 65 feet tall and one block long building will tower over the neighborhood (where the very tallest existing building is only 50 feet) and will block sunlight to several surrounding blocks at various times of the day. The quality of life for residents in this neighborhood will be diminished forever by the physical impact of this building.

Is there any doubt that a commercial structure of this size will generate a huge increase in traffic in the area? Even now, it is extremely difficult to find on street parking in this neighborhood during business hours and many weekday evenings. The addition this building will further choke the neighborhood with traffic that endangers pedestrian safety and force residents to park many blocks away from their homes. Another safety concern is that the local fire station uses 19th Street as an access route – what will happen when it is clogged with double parked vehicles? It is absurd for the city to even consider the developer's request for a variance on parking requirements.

The proposed Bryant Square office complex will inflict severe environmental damage upon a desirable working class, residential neighborhood. If the city of San Francisco truly wants to maintain the quality of life in such neighborhoods, it will not allow construction of the proposed building at the Bryant and 19th-20th Street site in its present form. At a minimum, the project needs to be scaled back to three stories with below ground parking for all building tenants.

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James Kussow & Merle Wilson, Jr.

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JAN 04 2000
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

January 2, 2000

Environmental Review Officer
S.F. Planning Dept.
1660 Mission St.
SF, CA 94103

I'm writing to express my opinion about The proposed 5 story office complex on Bryant, between 19th, 20th.

I disapprove of The current proposal for 2 major reasons:

1. The building is too large and incongruent to The character of The North-East Mission. The size and The design looks more suitable for an office park (truly), not a San Francisco Neighborhood.

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2. I can't believe a parking variance would even be considered. The current parking situation of This neighborhood is dense enough. PLEASE DON'T GRANT A PARKING VARIANCE!

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Unfortunately The current proposal seems to heavily favor The best interests of The developer & The land's owner over That of The citizens. Please don't help to ruin San Francisco's Unique character. It's what makes This city great.

2a

Sincerely,

Tom Scott, 2633 20th ST. (owner) 

Kathy Scott
2633 20th Street
San Francisco, CA 94110

January 1, 2000

Hillary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Dear Ms. Gitelman:

I am writing to express my concern over the building proposed for the corner of Bryant and 20th Streets in the Mission District of San Francisco.

I have seen images of the preliminary design and have the following objections. The building seems out of character for the neighborhood in which it is being built. There have been several successful buildings built or remodeled in this area that do not jeopardize the neighborhood's character (the Green Glen Building and the Mill Building are two examples). This neighborhood is distinguished by former warehouse and light industrial buildings of brick and concrete construction. Because they were designed with industrial use in mind, they tend to be built with an honest, simple character that is augmented by the richness of their utilitarian materials. Because they are close in vintage to the residential buildings that surround them, they blend easily with the smaller scale buildings. They do not overwhelm them.

The building that is proposed for this site would be better suited for a new office park in the suburbs than an urban neighborhood with a history of industrial activity. Its hulking form suggests that the developer has nothing in mind but maximizing the usable square footage. The setback of the exterior walls at the top level from those at the lower levels is a hollow gesture at reducing the building's bulk. The building appears bulky because it does not appropriate any recognizable building type. It looks like a diagram of allowable building massing that one would see in a planning code. Additionally, its ribbon windows do nothing to match the character of the buildings around it. When neighboring buildings were constructed earlier in the century, large expanses of glass were

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either technically or financially unfeasible. Simply because ribbon windows are now cheap and readily available does not make them appropriate. Ribbon windows typically are more appropriate when viewed through a car window at 45 mph (as they are in office parks). In an automobile-oriented environment, architectural character and detail go unnoticed. In a pedestrian-oriented environment, however, details and a human scale are crucial to maintaining a neighborhood's pleasant character for its inhabitants. Smaller punched openings better relate to the pedestrian scale of the neighborhood.

Also of concern is the variance being sought to allow the developer to provide less than the required number of parking spots. It is understandable that an older building being remodeled may have trouble meeting parking requirements. Older buildings are limited by their existing form and the fact that automobiles did not exist when they were originally designed (and hence were not planned for). New buildings have no such arguments to make! The only reason a developer of a new building would have to want to be relieved of parking requirements is to save himself money. The developer has every opportunity to build an underground garage so that he may lessen the burden his building places on the neighborhood.

Please take these concerns into consideration. The approval or disapproval of this building will have a significant impact on the quality of life in the Northeast Mission. This neighborhood deserves better.

Sincerely,



Kathy Scott

2633 20th Street

Homeowner and Licensed Architect

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January 5th, 2000

Tim C. Mangan, AIA
2631 - 19th Street
San Francisco, CA 94110
415.826.4935

To: Environmental Review Officer
City and County of San Francisco
Department of City Planning
1660 Mission Street
San Francisco, CA 94103

Re: File No. 98.635E Bryant Square
Comments on Draft Environmental Impact Report

I am the owner of the residential property at 2629-31 -19th Street, located directly across the street from the 19th and York Street corner of the Bryant Square Project. The following are my comments on the Draft Environmental Impact Report (DEIR) for the Bryant Square Project:

1. The DEIR states that the live work units recently completed on the Bryant Square block are not part of the project analyzed in the DEIR. The impact of these units with full occupancy must be assessed along with the project impacts. It is my understanding that the live work units (and the majority if not all of the commercial units as well) are now occupied. Therefore, the impacts associated with these units, in particular but not limited to parking and traffic impacts, must be assessed as part of an analysis of the impacts resulting from development of the project.
2. Page 1-6: The DEIR states that the parking shortfall associated with the project would increase competition for limited on-street parking, which is currently near or exceeding capacity. Parking in the vicinity and in particular on the 19th Street side of the Bryant Square block is clearly exceeding capacity during business hours. This situation has made it extremely difficult for people who live in the immediate area. Installing metered parking will not adequately mitigate the parking impacts. Adequate parking to meet project demands should be incorporated into the project. Metered parking along 19th Street, which contains all residential units on the east side of the street and live work (along with commercial) on the west side, is inconsistent with the primarily residential nature of the block.
3. Page 3-9: The DEIR states that the demolition of the storage building at the corner of York and 19th Streets and replacement with a new two story building would have "little noticeable visual change to the area." Due to the corner location, replacement of a small unobtrusive structure with a new two story office/retail building will change the visual quality of the corner. Treatment of this corner of the project is important to the overall visual character of the area and the new building should be consistent with the visual character of the buildings on the adjoining corners.

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4. Page 3-16: Appropriate setbacks from the live work building should be incorporated into the new structure at the corner of 19th and York Street to maintain the ability to see the old historic Felt Co. sign on the north end of the live work building from at least some vantage points (even if limited).
5. Page 3-20: Existing intersection conditions appear to be based on counts taken in 1998. These counts would not be representative of existing conditions, as other new development (in addition to the live work building which appears to be included in the more recent Duffy analysis) since 1998 would increase substantially the counts at local intersections. At the morning and evening peak hours, there is considerable traffic consisting of people driving around the block trying to locate a parking space. This activity creates congestion at the intersections surrounding the project block and, if less than required parking is provided, this situation will worsen after the project is constructed and occupied. An accurate assessment of existing traffic plus the project traffic is needed. The impact on the 19th and York Street intersection should be examined in light of the fact that it is one of the few intersections that currently does not have four way stop signage. With the addition of project traffic, the conditions at this intersection will worsen.
6. Page 3-22: It appears that the parking supply in the project vicinity was assessed in 1998 (parking inventory and occupancy count). This information would not give an accurate description of existing conditions as there has been substantial new development (in addition to the live work building) which has exacerbated the shortage of parking in the area. The demand exceeding supply expressed on page 3-23 is much worse today than it was in 1998.
7. What is the effect of project freight loading off of 19th Street on traffic along 19th Street and at the intersections of 19th and York Streets, and 19th and Bryant Streets? The statement on page 3-36 regarding the low volumes of traffic and pedestrian flows along 19th Street does not seem accurate, at least with respect to traffic.
8. The project should include adequate parking to meet the project parking demands and should have adequate ingress and egress to avoid on street queuing of vehicles. The alternative that provides sufficient parking (Parking -Demand Compliant Alternative) should be selected to avoid creating even greater parking problems in the area than currently exist. In addition, this alternative proposes office use only (and not office and retail). Office use is preferable because it would not create the same level of parking and traffic impacts that the office/retail scenario would and it would reduce the need for metered parking.

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Thank you for your attention to these comments.

Sincerely,



Tim Mangan

What's Wrong with the Bryant Square Project

As a general comment, the proposed five-story office building at 20th and Bryant is a blank modernist box designed to maximize high tech office space (and thus the owners' profits) on the site. It makes no concessions to the architectural legacy or character of the Mission District, nor does it offer the existing population of the Mission prospects of employment (except maybe as parking valets) since few current Mission District residents are likely to be employed in the "high tech and multimedia" offices envisioned for this site. It's another instance of the trend towards the work space of the city becoming a high-tech corporate monoculture.

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Transit First Should Mean Transit First

This project, as described in the EIR, clearly violates the city's alleged Transit First policy. Proposition M stated that use of automobiles for commuting was to be discouraged. Yet the project is clearly designed with the assumption of the private automobile as the primary means of transport. The project provides no amenities or enhancements to the environment for transit users or pedestrians.

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In the surrounding neighborhood 42% of the households do not have motor vehicles (as of the 1990 census). Nearly eight out of ten renter households in the Mission District do not have cars. If this project is to fit into this neighborhood, it must take account of this high level of reliance on walking and transit in this area.

• Way Too Much Offstreet Parking

We need to consider not just this project in isolation but the cumulative effect of numerous recent projects which have led to the neighborhood being inundated with cars. The nearby "big box" Potrero Center acts as an automobile sump, attracting people in cars from miles around. Dumping more traffic on the streets here makes the Mission increasingly dangerous for kids and the elderly.

Providing lots of parking is one way in which people are encouraged to drive to this location. Parking is a subsidy to automobile use. If parking is scarcer, people are encouraged to use other ways of getting to this location, such as riding a bus, walking, or bicycling. The site is less than a mile from two BART subway stations, which is a walkable distance for many people. The 27-Bryant bus line is one of Muni's most reliable lines.

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The hue and cry about "not enough parking" reflects the short-sighted and self-centered thinking of owners of motor vehicles. But make no mistake about it, the more offstreet parking is provided, the more auto traffic there will be. Making the streets of the Mission District safe and livable means discouraging auto driving, not encouraging it.

Suggestion: Reduce the parking garage to just one level, if the envisioned 150,000 square foot building is approved. If the office building for 20th and Bryant is scaled down, reduce the allowed offstreet parking even further.

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• Encourage Transit Use and Walking

Why is it okay to allow a developer to provide amenities (a subsidy) for automobile use but provide nothing for walking and transit use? This is a blatant violation of the Transit First policy. The sidewalk on the Bryant Street side of this project has been narrowed to the width of a mere hallway, a ridiculous six feet at one point. With new construction we now have the opportunity to widen the sidewalk. Since retail storefronts are envisioned as a possibility for the ground floor of this building, this is another reason to widen the sidewalk.

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Amenities that encourage transit use should also be required. It isn't sufficient that the developer merely buy off the Transit First policy by giving some money to Muni. This doesn't do anything to encourage transit use at *this* particular project. There is a minimalist Muni bus shelter at 19th Street but no facilities at all for bus riders at 20th Street, despite the high proportion of households without cars in this neighborhood and the desirability of using transit, given the density and compactness of the Mission district.

This project clearly is in violation of the San Francisco General Plan, Objective 11, Policy 7: "Encourage use of transit and other alternative modes of travel to the private automobile..." and Objective 11, Policy 3, "Encourage development that efficiently coordinates land use with transit service, requiring that developers address transit concerns...." It's as obvious as the noonday sun that this project has done zilch to encourage public transit usage (apart from any mandated payments to Muni, which is irrelevant to the characteristics of this particular project).

Suggestion: Require more of a setback for the proposed office building at 20th and Bryant on the Bryant Street side and widen the sidewalk at this point, preferably to 20 feet. At a bare minimum, the narrower portion of the sidewalk near 20th Street should be widened to the same 15 foot width as the part of the block in front of 2101 Bryant. Other amenities to improve the walking environment should be provided; for example, planter boxes, street furniture, etc.

Suggestion: Have the developer build special bus shelters for transit riders at 20th and Bryant Streets, northbound and southbound, with such amenities as: interior lighting, benches, bus information, trash receptacle (to reduce litter), and public phone. If the developer pays for it, they could take credit for it by displaying their own corporate name or info about their project.

How does this project help the residents of the Mission?

There is clearly a mismatch between the needed employment opportunities for present Mission District residents and the types of activities envisioned for this project.

In a piece of propaganda that was mailed to me by Dan Kingsley of SKS, this project is allegedly going to provide "jobs for local residents." However, the existing population of the Mission district is predominantly working class, with a median family income in 1990 of \$27,000. Most Mission district residents do not have the backgrounds to apply for the "high tech and multimedia" jobs that the EIR states as SKS' intended use for the project. Moreover, SKS has already evicted the sweater factory from the 2101 Bryant building.

This is an example of the displacement of blue collar jobs that is characteristic of this project. And dozens of working artists have been evicted from the contractors' sheds south of 2101 Bryant. What about their work prospects?

By changing the use of the 3-story "curtain wall" building at 2101 Bryant from light manufacturing to high tech offices, SKS will make this building less useful as far as providing employment for the actual Mission population. The propaganda from SKS talks about "reflecting the industrial character" of the area but apparently this does not go so far as to actually respect industrial work itself.

Suggestion: Require that the curtain-wall building at 2101 Bryant continue as before, accommodating light industrial uses. Require the previous tenants be given the opportunity to move back in, at rent levels pegged to their previous rent level. The cost of the seismic retrofit can be considered to be a payment to the community for agreeing to let SKS impose the 150,000 square foot monolith at 20th and Bryant.

-- Tom Wetzel

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Subject: No on Bryant Square

Date: Tue, 04 Jan 2000 15:28:20 -0700

From: David Jayne <davidjayne@earthlink.net>

To: Jim_McCormick@ci.sf.ca.us

Regarding Item 12 (98.635E) on the agenda for the 1/6/2000 Planning Meeting:

Please don't allow approval of the proposed Bryant Square project, to be built at the corner of Bryant and 20th Streets. The architecture would clash with the existing character of the neighborhood. The proposed height and intent to build the structure right up to the property line would block direct sunlight and views for numerous existing properties. Parking congestion would almost certainly increase. Also, we don't believe this project is geared toward the artistic or industrial populations which currently occupy this space.

Again, for 1/6/2000: No on item 12 (98.635E).

Sincerely,

David Jayne and Kay Hoskins
908 Potrero Avenue
San Francisco, CA 94110

p.s. We hope to attend the meeting, but please let me know by tomorrow, 1/5, if this e-correspondence is enough for public record, or if I need to deliver hard copies.

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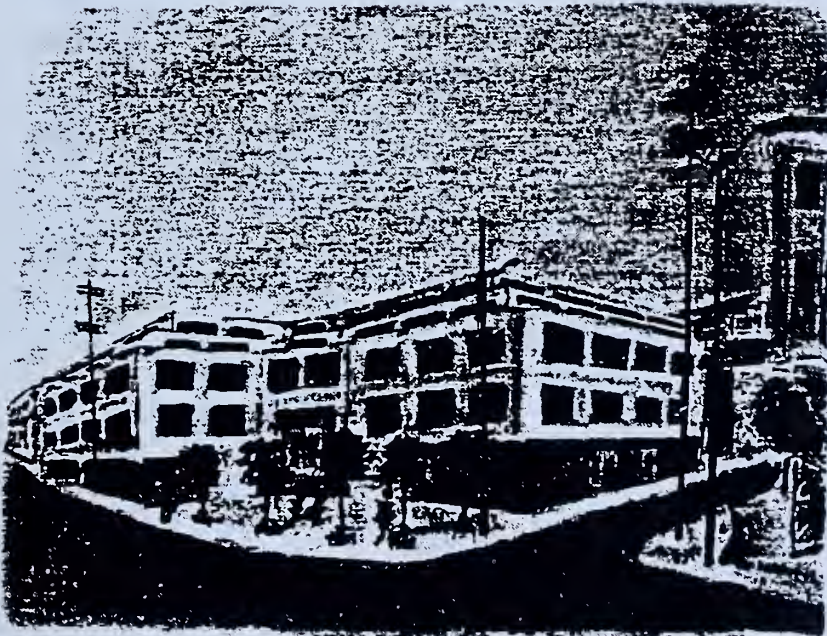
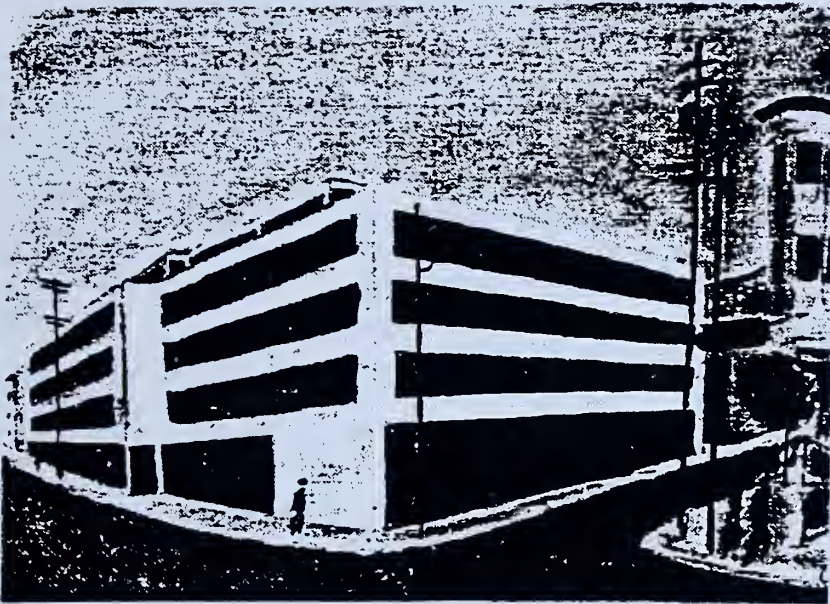
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Bryant Square Project: A Visual Study



These sketches, originally done in pencil and charcoal, examine the existing and planned structures at the Bryant Square site.



The alternative concept shown below and at left is one possible outcome of a collaborative planning effort involving members of the community.



To: Environmental Planning Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

From: Joshua Cohen
2206 Bryant Street
San Francisco, CA 94110
jdc21@mindspring.com
work: 415-391-6757

Re: Draft Environmental Impact Report for the
Bryant Square Project (Case File No. 98.635E)

The Bryant Square Project, because of its size and location at the center of a transition zone between residential and mixed use industrial neighborhoods will have a substantial impact on the surrounding community. I have called out a number of areas in which the findings of the draft environmental report do not seem adequate or accurate. I hope these will be addressed in the Planning Commission's comment and response document.

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Land Use

Project has already displaced an established community of small business owners and artists. Intensification planned for site is significant in relation to predominately residential uses immediately surrounding the project.

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Visual

Report lists four significance criteria, but then makes illogical conclusion based on just one these: view from public areas. Because of its size and distinct architectural style, the project will dominate the view from numerous community gathering points in the immediate vicinity. (See Reverse) A community impact report or collaborative planning group would seem to be an appropriate way to handle this issue.

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Historic

Report describes the addition of a new level (of a distinctly different architectural style) to 2101 Bryant Street. This will be visible from numerous points in the project vicinity, most notably when approaching the site from the north, walking down Bryant Street from 16th to 19th Street. This is a significant alteration to a historic structure.

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Transportation

In Table 3: Proposed Trip Generation (page 3-26), a figure of 8.5% is listed for PM peak hour percentage of new trips generated by office space. This figure seems too low.

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Traffic counts used for report were performed on January 21, 1998 for 16+Bryant intersection, and October 23, 1998 for others. Since that time, the neighborhood has seen significant traffic growth. Report should acknowledge this fact rather than just assuming a 1% rate for future growth (page 3-27).

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No count was performed at 17+Bryant intersection which has the worst LOS of any unsignalized intersection in the area, with 30-60 second delays during the PM peak hour.

Growth

Report concludes that the proposed project would have no discernible effect on growth, but then predicts the addition of 510 new employees, an increase of more than ten times. This should be viewed as more significant than an "incremental increase."

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Date: 01/06/2000 12:17 PM
Sender: Davina Smith <davinas@yahoo.com>
To: Joy Navarrete
Priority: Normal
Subject: Comment on Bryant Square Project

Dear Ms. Navarrete,

I just found out about the proposed Bryant Square project and I must say that I am appalled by it. I live at Bryant and 23rd and I DO NOT want this office block built for several different reasons.

It will make an already tight parking situation impossible. As it is, I often have to park 3 blocks away from my house and I can't imagine what it will be like with the influx of people from this building. I understand that the building plans include underground parking for employees, but what about the deliveries, the people coming in for meetings, the temp workers, etc.?

One of the great things about most San Francisco neighborhoods is the mixture of commercial and residential buildings. We already have a huge commercial complex at 16 and Bryant. To have another one at 19th will spoil the residential and commercial flavor of Bryant St. Let's be honest, no one wants to live next to an office building.

This building would force out the small businesses and artist studios that currently exist in that space. It seems extremely unwise to take away local jobs and companies and replace them with commuter jobs.

So please, do not approve the Bryant Square Project. Prevent this severe injury to my neighborhood.

Thank You,

Davina Smith
2529A Bryant St.
San Francisco, CA 94110
415-826-7889

Do You Yahoo!?

Talk to your friends online with Yahoo! Messenger.
<http://im.yahoo.com>

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Steve Hovland
728 Hampshire
San Francisco, CA 94110

January 3, 2000

Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

Dear Ms. Gitelman:

I am writing to ask that you reject the proposal for the Bryant Square Project discussed in File No. 98.635E.

My main reason for asking this is purely personal. After studying the shadow analysis in this report, I realized that I would lose the view of Twin Peaks which I presently enjoy. This is because the proposed structure is 5 stories tall. A lower structure would preserve my view. Losing my view would certainly make my environment worse and also harm the property values for those of us who will lose our view.

Another reason for rejecting this proposal is the effect on parking. The project will only provide about 300 parking spaces for a building where 500-600 people can work. The draft report notes that this neighborhood is already at full capacity for parking. Some of those people who can't park in the building will come in by bus. But others will insist upon driving, and will thus make things worse for the businesses and residents who are already there.

This project should not be considered in isolation. Soon another project will be completed at 2300 Harrison- just a few blocks west of Bryant Square. I understand that a 500-person firm is planning to move into it. From what I can see this project provides very few off-street parking spaces. It seems reasonable to assume that the neighborhood will be adversely affected even before Bryant Square is started. Perhaps this project should be delayed until we see the impact of the other projects already under way in the neighborhood.

I understand that the City feels that people should use mass transit to come to these places. Unfortunately, America is a car culture, and people tend to go where their cars can go. As parking becomes worse in San Francisco, more taxpayers will have an incentive to move to Dublin/Pleasanton and other places in the Bay Area where there is an abundance of free parking and affordable housing.

Finally, I think this project should be rejected because the design of the proposed building does not harmonize with the rest of the neighborhood. This building will

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stick out like a sore thumb because it will be the tallest building in the neighborhood. In addition, the forms and colors do not relate to other buildings surrounding it. In fact, it does not relate to the brick building on 19th and Bryant which will be part of the project. I have enclosed photographs of the neighboring structures.

Respectfully,

A handwritten signature in black ink, appearing to read "Steve Hovland", with a stylized, cursive script.

Steve Hovland

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RECEIVED

JAN 10 2000

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNINGCary R. Boisvert
2156 Bryant Street
San Francisco, CA
94110Hillary Gitleman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

January 4, 2000

Subject: Draft Environmental Impact Report# 98.635E and
The East Side 2100 Block of Bryant Street Project

Dear Ms. Hillary Gitelman :

I am writing to you to express my concerns regarding the above mentioned development projects intended for the 2100 block of Bryant Street area since I am unable to attend the January 6, 2000 Planning Commission meeting regarding the project. I have been a residence at 2156 Bryant Street for over four years and have viewed the various developments going on in the area with mixed feelings. Although I appreciate the general upgrade of the area I am terribly concerned about this new forthcoming development.

The proposal for a five story 166,815 sq. ft. office building not only is aesthetically overwhelming, but creates a crushing impact with regards to parking and overall traffic congestion. Though the building will hold upwards of 500 people working there, the parking will barely accommodate 300. This, combined with the probable high volume in traffic of customers of both the retail and office spaces, will make an already difficult parking situation tremendously worse. As it stands now with all the variety of small business operations, restaurants and residences, the parking during the day is extremely difficult to find within a reasonable distance of one's destination. Added to this is the commercial building going up at 2300 Harrison Street, which will also be a 500 plus person building with very little off-street parking.

I am generally not opposed to development, but I feel that this current project will completely overwhelm the entire area on both a practical - parking, congestion, noise, etc . . . and aesthetically dominate and crush an area that generally has heights that do not exceed three stories. Please consider these concerns seriously in your assessment and limit this gigantic project to a more reasonable and harmonious size. Thank you for your considerations.

Sincerely,

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JAN 10 2000

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

January 4, 2000

Hillary Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Draft EIR 98.635E

Dear Ms. Gitelman,

It has come to my attention that a planned commercial project, "Bryant Square", could house 500 to 600 people while only providing 300 parking spaces. If this project proceeds at its location on Bryant Street between 19th & 20th Streets, it will adversely effect the already tight parking situation in the adjacent area.

A commercial entity of this size needs to provide adequate parking to accommodate its tenants as well as the people and cars that will come to the area to do business with the project's tenants.

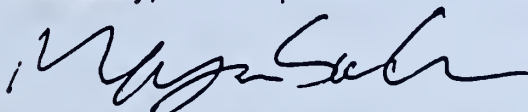
It is my understanding that new construction in The City requires adequate parking. This project does not provide the number of parking spaces required for the number of people that will occupy and do business at this location. The obvious solution would be the construction of additional parking within this complex.

Why couldn't the developer build additional parking that could be used by the public? It seems feasible to build a commercial building with public parking. There should be a benefit to the community at large (grossly needed parking spaces) if a project of this size is granted a building permit.

Please do not issue a permit until this parking issue is resolved. This should apply not only to this project, but to any project of such magnitude.

Thank you for taking my concerns into consideration.

Sincerely,



3119 - 20th Street

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RECEIVED
JAN 10 2000
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Fossil Faux Furniture

2609 20th STREET • SAN FRANCISCO, CA 94110
415 826.1911 • 415 826.2910 fax
www.fossilfaux.com

January 4, 2000

Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

To Whom It May Concern:

As a neighborhood resident and business owner I am writing this letter to express my concerns about the proposed office complex on Bryant Street between 19th and 20th Streets. I feel that the proposed structure is inappropriate for the surrounding neighborhood in both scope and character. This is a critical time for San Francisco to begin to pull in the reins from the recent plethora of inappropriate constructions flooding the city. If we do not begin to carefully analyze and plan now, our city's wonderful diversity and intimate scale will be lost forever. The proposed structure for the Bryant/19th & 20th block is much too large in scale for the current residential/business neighborhood. I also believe such a structure with a variance on parking requirements is sure to negatively impact the surrounding area which is already feeling the pressures of limited parking.

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I implore you to consider this and other new constructions with the greatest of care, taking into consideration any associated impacts to the area's environment, residents, character and use. If the aforementioned building is built as currently proposed, I feel it will adversely effect the immediate area eroding the neighborhood character, spaciousness, views from surrounding residences. The time is now to stop the glutinous, ill-conceived constructions by short-sighted, money-hungry developers.

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Sincerely,



Marcia Stuermer
Owner/Fossil Faux Furniture and
Neighborhood Resident

Simone Eastwood
716 Hampshire St.
San Francisco, CA

94110

Environmental Review Officer,
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

I am strongly opposed to the construction and general concept of the Bryant Square Project!

Where to begin?

The architecture is at best inappropriate. It resembles something like a minmall.

Really the only explanation for such an eyesore would have to do with greed and money.

Parking - don't get me started.

Obstruction of views and sunlight !!!!! wrg!

I am opposed to the construction of The Bryant Square Project!

thank you!

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RECEIVED
JAN 10 2000
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Antje Kann
722 Hampshire St
San Francisco, CA 94110
(415) 824-8788
December 17, 1999

Environmental Review Officer
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

I am a homeowner on Hampshire Street and would like to express my opinion on the Environmental Impact Report for the Bryant Square Project. I strongly disagree with the conclusions stated in the report that this project will not leave any significant impacts on the neighborhood. Mainly, the project's height and bulk will reduce sunlight on many adjacent buildings; it will eliminate stunning views on Twin Peaks for long-time neighborhood residents; it will create a parking havoc; and it will permanently change the character of the neighborhood with its inappropriate architecture and retail and office use. I also feel that the Alternative Projects listed in the Environmental Impact Report do not represent any alternatives that appropriately address all the important issues.

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1) Omission of reasonable alternative projects:

The Environmental Impact Report is missing an alternative that both provides adequate parking and features reduced height. The proposed Alternative Projects either address the parking issue, or the height and bulk issue, but not both. Thus, the developers purposely leave out any alternatives that would be acceptable to the neighborhood. What we need is a reduced scale and scope of this development which provides adequate parking and blends in architecturally with the historic buildings surrounding it on all sides! The developers' rejection of the existing alternatives is also inappropriate. There are in fact many economically feasible options for a more toned-down development, as evidenced by many other developments that are currently in progress in this area.

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2) Obstruction of views and sunlight:

As demonstrated by the Shadow Fan Analysis, the proposed project will shade many residential buildings to its East in the afternoons, and some residential buildings to its West in the mornings. The buildings to its East currently enjoy a breathtaking view of Noe Valley and the Twin Peaks area, which is enhanced by sunsets and the rolling fog bank typical to that part of San Francisco. In addition to removing the sun in later parts of the day, this view would be completely obstructed by the proposed building, i.e., there would be no remaining glimpse of the city or Twin Peaks. For many residents, this view was the reason for purchasing their houses on this street, and property values for these houses are higher than for those houses without the view. Hampshire and York Street between 18th and 21st streets are mostly occupied by long-time residents. The majority of occupants are home-owners, and many houses have been in possession of their families for many generations. Many of the residents on these streets grew up with the view of Twin Peaks and intimately associate it with this neighborhood.

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The attached “before and after” photos demonstrate the impact of the proposed building on the views of these residents. This project should not be allowed to be any taller than the peak of the roof of the existing structure along York Street!

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3) Parking:

Irresponsible development in this neighborhood has produced a parking crisis over the last two years. Many of the loft developments and commercial projects have successfully evaded requirements for parking that would meet the demand they have created. Long-time neighborhood residents with street parking now circle for up to half an hour to find parking spots. The issue is even worse during the day, and the Bryant Square Project would only aggravate this problem. It is an obvious issue that SKS should not be able to obtain a variance on parking requirements. In addition, a valet garage should not be considered “public parking”, and many visitors to the side will be tempted to hunt for street parking before they enter the underground garage.

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7c

4) Neighborhood character:

- The proposed five-story new building, in addition to being taller than all other structures in the area, would significantly alter the character of the neighborhood through its inappropriate architectural design. Current structures in the neighborhood consist of a mix of old warehouses with unique architectural designs, some renovated, and Victorian residences. There are no other structures of the scale and visual type of the proposed building. This neighborhood is not an appropriate location for a modern, glass, office building:
- Regarding the building on 700 York St., the proposed second story extension would cover up the unique and historically significant gable and stepped roof with the old letters “Pacific Felt Company” painted on the brick side of the “Mill Building”, which is a historically significant building. This unique gable contributes to the character of the neighborhood, which integrates old warehouses with residential development.
- The proposed 4th floor extension to 2101 does not match the architectural character of the existing building. While this floor is set back and will be less visible from the street below, it will be visible from 19th street, both East and West of the building, and from many of the residences surrounding the development. This floor, if built, should match the architectural character of the existing building.
- The traffic and increase in the number of people generated by this project will significantly alter the character of the neighborhood.

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Even as recently as a year ago, many residents were embracing the development of this neighborhood. However, bad planning and lax enforcement of the rules that typically protect neighborhoods from the type of overcrowding we see today, has changed the attitude of every resident I have spoken to, against any further large-scale developments. This neighborhood cannot handle another out-of-proportion development!

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Sincerely,

Antje Kann

-- 000 --

SAN FRANCISCO PLANNING COMMISSION

ITEM 12: 98.635E

DRAFT ENVIRONMENTAL IMPACT REPORT

-- 000 --

BRYANT SQUARE PROJECT

PUBLIC HEARING

3:11 P.M. TO 4:22 P.M.

SAN FRANCISCO CITY HALL, ROOM 400

THURSDAY, JANUARY 6, 2000

APPEARANCES

COMMISSIONERS:

PRESIDENT: Anita Theoharis

VICE PRESIDENT: Beverly J. Mills

DIRECTOR: Gerald G. Green

SECRETARY: Linda D. Avery

ASSOCIATE PLANNER: Joy Navarrete

Dennis A. Antenore, Hector J. Chincilla, Linda Richardson,
and Larry Martin

SPEAKERS:

Corinne Fendell

Teri Matelson

Jul Niemier

Mary Bennett

Peter Sutherland

David Jayne

Lichen

Kay Hoskins

Steve Horland

Andy Hope

Tom Wetzel

Samon Eastwood

Paul Lent

Sue Hestor

Batel Tibes

Jake Fielder

David Maltz

Gisele Paris

Joshua Cohen

Jonathan Youtt

James P. Corcoran

-- 000 --

THURSDAY, JANUARY 6, 2000

3:11 P.M. - ITEM 12

MS. AVERY: Item No. 12, 98.635E, Bryant Square Project.

This is the public hearing on the Draft Environmental Impact Report.

It should be noted that public comments will be accepted from November 20th until 5:00 p.m. this day or at the close of this public hearing, whichever is later.

MS. NAVARRETE: Good afternoon, President Theoharis and Commissioner. I'm Joy Navarrete from the Planning staff.

This is a hearing to receive comments on the Draft Environmental Impact Report for the case No. 98.635E, the Bryant Square Project.

The Project proposes to renovate two additional structures, demolish three on-site structures, and construct a project with about a 153,000 square feet of new office, 9,500 square feet of retail and about 4,700 square feet of light industrial space.

The draft EIR found that there were no significant unavoidable environmental impacts anticipated as a result of this project.

The staff is not here to answer comments today.

Comments will be transcribed and responded to in writing in the comments and responses document which responds to all comments received and makes revisions to the draft EIR as appropriate.

Once the comments and responses are completed, the draft EIR and commentator responses will make up the final EIR and there will be a hearing at which the Planning Commission will be asked to certify that EIR as complete.

This is not a hearing to consider approval or disapproval of the project. That hearing will follow the final EIR certification.

The comments today should be directed to the adequacy and accuracy of information contained in the draft EIR.

The commentators should speak slowly and clearly so that the Court Reporter can produce an accurate transcript.

Also, commentators should state their names and addresses so that they can be properly identified and so that they can be sent a copy of the comments and responses when it is completed.

After the comments from the general public, we will also take any comments on the draft EIR by the Planning Commission.

Further, any comments here will extend until 5:00 p.m. today or at the end of the public hearing, whichever is

later.

THE PRESIDENT: Thank you.

Each member of the public will be given five minutes. Corrine Fendell?

VOICE: To sign up, or what?

THE PRESIDENT: Take the speaker cards first and you can either submit one now or you can wait.

Corrine, are you here?

MS. FENDELL: Yes.

THE PRESIDENT: And if you could please move towards the front of the room when your name is called?

After Corrine, we will have Tom Wetzel.

MR. WETZEL: Here.

MS. FENDELL: Hi.

I guess I'm a little bit naive because I didn't quite understand what this reads, I guess the report that was read.

I mean, I gather there is another hearing, too, --

THE PRESIDENT: This is for your comments.

MS. FENDELL: -- of the report?

THE PRESIDENT: This is for your comments.

MS. FENDELL: This is the only time?

THE PRESIDENT: Right, and then your comments will be added to the final Environmental Impact Report that will come before this Commission but all responses have to be

either oral or in writing, have to be at this hearing or at the close of the hearing today.

MS. FENDELL: All right.

My name is Corrine Fendell. I live at 720 Hampshire Street which is between 19th and 20th Streets, and I have lived there for twenty-five years.

I have actually owned a home. I own -- own the house I live in. It is a single family dwelling and I moved there, as I said, years ago and it is quite phenomenal what's taken place in the neighborhood.

I think I moved into what was at that time a red-lined district but that is no longer done and, within the past five years, of course, the same neighborhood has become incredibly popular. I think it is one of the last frontiers.

THE PRESIDENT: I'm sorry to interrupt you but let me explain further and, please, for the rest of the public, you are just ... You are not -- these comments are not about the project itself. It is just specific environmental issues, traffic impact.

VOICE IN AUDIENCE: That is crock! We should be able to comment on the whole thing.

THE PRESIDENT: Excuse me.

If I hear another outburst, I will recess this proceeding and get a Bailiff. This is a formal proceeding.

I don't pamper that sort of behavior and, sir, if

you can't behave, then you need to leave.

Okay. So, anyway, you just ... Today is testimony with regard to the environmental impact for the project.

Then, as I told you, those will be incorporated into the final report and, after that, there will be another hearing on the project itself and that will be another opportunity for you to speak as to the merits -- specific merits of the project.

Okay. I'm not going to take away from your time because I just thought -- you said you needed an explanation, and I thought this would be helpful.

MS. FENDELL: Right.

Well, this is the first time then we are given this explanation right here. I mean, I had no idea. It is interesting. I only saw this flyer when I --

THE PRESIDENT: You need to testify. You need to comment.

As far as getting an education into the Planning process, if you call the Planning Department during business hours and if you have any questions about any processes that or proceeding with regard to hearings, there will be someone who will be able to help you.

This is a hearing regarding environmental impacts, comments on the environmental -- the draft environmental impact of this Project. Okay? Thank you.

MS. FENDELL: All right, then.

I will pass because I think there are others who will bring it in a more -- in a clearer way because you say there will be another opportunity.

THE PRESIDENT: There will be another opportunity, yes. There will be a hearing specifically on the Project.

MS. FENDELL: All right.

THE PRESIDENT: Thank you very much and, as I said, feel free to call the Department for an explanation of the proceeding.

Tom Wetzel, and after Mr. Wetzel, Steve Horland.

MR. HORLAND: Here.

MR. WETZEL: My name is Tom Wetzel.

I live at 2605 19th on the east of this Project. I've lived in the Mission ... well, I first moved to the Mission in 1981, so I'm a long-term Mission resident.

My basic problem with this Project and with the environmental impact statement is that the Project is in grave violation of the transit first policy.

What you have here is a situation where you provide hundreds of off-street parking spaces which are essentially a subsidy and encouragement and inducement to people to drive or to use hundreds of highly paid hi-tech employees in their muscle cars, the Mercedes, SUVs inundating my neighborhood

daily by means of subrogation and providing zero, zero amenities for pedestrians and transit users.

The fact that the developer can buy off the transit first policy by making some kind of payment or any kind of payment, to me, is completely irrelevant, does not address the actual character of this particular project.

Moreover, another deficiency of the environmental impact statement is that it is completely fallacious and a mistake to not consider the cumulative effect of all the projects in this neighborhood in the City in general in terms of their impacts on the environment.

You provide increasing amounts of parking supply, off-street parking which the City not only allows, they actually require developers to do.

Now, the effect of increasing of the -- the supply of off-street parking inevitably is to induce ever greater amounts of parking or traffic and driving with the amount of vehicle miles traveled per capita in San Francisco will be inevitably increased.

The streets are going to be more and more inundated with traffic and are going to be made more and more unsafe for the pedestrians, for the elderly people included, and the service on the Municipal Railway, as we have seen, is going to continue to deteriorate because the traffic congestion will be delaying the buses so that they cannot keep their

schedules.

It is very instructive, for example, to compare San Francisco to two other cities that have a similar level of proportions and also the amount cars, namely, Detroit and Central Los Angeles.

In Detroit, thirty-two percent of the households, the amount of cars and Central L.A., has thirty-eight percent of the sample. So, that's thirty-one percent.

They are all really pretty possible but the per capita rate and transit usage in San Francisco is three times what it is in those other cities.

Clearly, major factors supporting this high level of transit usage in San Francisco is the scarcity of parking.

So, what will be the cumulative impact of all these projects by increasing the supply of off-street parking year after year inevitably is going to increase the amount of traffic.

All you have to do is see the impact. Go down to 16th and Bryant in my neighborhood on any afternoon and see the incredible gridlock of traffic that's been created by your approval of the Potrero Center.

It's a gridlock, automobile stump is what it is, attracts people from miles around in cars that live in the East Bay, I'm told, and that's going be the cumulative impact of more and more of these kinds of projects.

What you have to do in this case I think at a bear minimum is simply not allow the developer to put up anything like the amount of off-street parking that they're thinking of, the three hundred spaces.

I would suggest cutting it in half or less, you know, and if you are going to scale down the project, cut it even further.

There is also the fact that this is a blatant violation of the transit first policy. You do not require the developer to provide amenities for pedestrians and transit users without while at the same time providing a subsidy to people who are going to be driving into my neighborhood in their cars.

Things like, for example, requiring them to widen the sidewalks. I mean, they knocked out using the traffic sheds.

They have -- after having now evicted other than the working artists on Bryant Street, that street has an incredibly narrow sidewalk.

Here is an opportunity to force them to widen the sidewalks to twenty feet.

Why not require them, for example, to build a well-lighted bus station on both northbound and southbound for the 27th bus at 20th and Bryant Street? And here is an amenity for transit users.

They were able to provide amenities for drivers.
They have got to provide amenities for pedestrians and
transit users or it is a violation of the transit first
policy. It is a violation of Prop M.

Thank you.

(Applause]

THE PRESIDENT: Who did that?

PERSON IN AUDIENCE: (Raises hand).

THE PRESIDENT: Okay.

You need to leave unless you can stop that because
I will make all of these people to be held up while I get a
Bailiff and that's what is going to happen the next time.
This is my final warning about that.

Okay. Steve Horland, come on up, sir. We all
need to be able to speak out without any kind of intimidation
no matter what our feeling is.

Steve Horland and then L-I-C-H-E-W or N?

VOICE IN AUDIENCE: "Lichen".

THE PRESIDENT: "Lichen"? Thank you, Lichen.
Go ahead, sir.

MR. HORLAND: I would like to address the issue of
parking from a somewhat different point of view than the
previous gentleman.

When I read the report, I noted that in the
footnote on Page 11, they anticipate that almost six hundred

people will be working in this building and yet they are only providing three hundred parking places.

The question is where are the other people supposed to go? If you look at Page 3-3 of this report, it says, "occupancy rates on the parking area averages about one hundred percent."

"Parking around the area is observed to exceed supply on several streets" and, indeed, if you walk around in this neighborhood during working hours on a normal working week, you will see that every last place is filled.

People are parking in the crosswalks and they are pulling up on the sidewalks and they are double parking all over the place, and I also think that we should not be considering this Project in isolation.

If you go to the SKS website and look in their September 1999 some of the partnership news, you will see that they are planning to open a building at 2300 Harrison in January.

This building is supposed to have five hundred employees and, yet, if you go and look at the parking lot on the southside of that building, it doesn't look like it is a whole bunch more than sixty cars.

So, where are this additional four hundred people supposed to park?

In addition to that, there are other commercial

projects and residential projects that are in progress up along Bryant Street which will also have an impact on parking.

Now, I understand that the City intends to promote transit and feels that that is the right way to go and that is a virtuous idea.

However, America is a car culture and people tend to go where their cars can go.

Now, all of these developments are targeted towards hi-tech companies and I have some photographs here of the kinds of places that the big successful multi billion dollar hi-tech companies are actually going.

SAT in Palo Alto, Hewlett-Packard in Palo Alto, Adjunct Technologies in Palo Alto, People Soft in Pleasanton where they also have an abundant supply of affordable housing.

Shakley Corporation, Ortho Corporation. Ortho has a parking facility that is bigger than the entire proposed project.

So, I think some of this needs to be slowed down so that we can assess the impact of parking on these projects and in these neighborhoods because I think it is going to increase air pollution as more and more people spend more and more time driving around and trying to find a place to park.

Thank you.

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THE PRESIDENT: Thank you.

Lichen? And then Peter Sutherland.

MR. LICHEN: Greetings.

My name is Lichen and I direct a Waking Dream (phonetics) team for a non-profit music, art and performance carnival group.

It is a seventeen-years carnival group at 18th Street between 4th and Bryant. We are actually ten years at that location.

The neighborhood is zoned M-1. I have seen in the past ... oh, let's see. The first one was for when you guys wanted -- one of the developers wanted to divide it up, okay? And the neighborhood is M-1.

The idea was that it was light industrial. So, you have those big businesses closed down but the neighborhood continues to be light industrial.

Office space is not in the light industrial requirement, i.e., the neighborhood should stay with light industry.

The losses running with the idea of the neighborhood pushed the market value up and affected everybody in the neighborhood that way and I think that you should look at this neighborhood as a shrinking option instead of an expanding option and I think projects like this are better situated, say, instead of in the China Basin where

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the biotechs is going to go up because they're near where 280 is and where transportation is that people that are car drivers go.

You know, and unfortunately, they drive into our neighborhood and park. As everyone has said, you can't park.

We are lucky even if we have one garage space which people are constantly parking in and everybody is at odds here.

People don't want to be complainers that complain about people but, definitely, I think you should consider keeping that turf particularly how it is now instead of the possibility of exploiting it with high priced development.

Thank you.

THE PRESIDENT: Thank you.

Peter Sutherland? Sir? And then after Mr. Sutherland, Jul Niemier.

MR. SUTHERLAND: I have some written comments that I would like to put into the file --

THE PRESIDENT: Great.

MR. SUTHERLAND: -- and make part of the record.

Thank you, for the various people that couldn't be here today (Giving document).

THE PRESIDENT: Okay.

THE SPEAKER: My name is Peter Sutherland.

I'm a eleven-year veteran resident of this

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particular neighborhood where this project is earmarked.

I live about two blocks of the Project and I have also read the DEIR pretty thoroughly and I would like to make the following comments which are that this report has not taken into consideration the overall development of our neighborhood, and I have seen this before in various other reports that have been issued for various individual projects.

I feel that at this point it is absolutely important that somebody does a complete study on all the cumulative effects of development in our neighborhood within like a five or a ten-block area because it's a fact that our neighborhood has gotten more development than just about any other area or region in San Francisco.

And I also want to make the comment that this project is probably the most important project that's ever going to be done in San Francisco for the simple reason and the pictures bear it out.

Basically, you are bringing downtown buildings and structures and melding them with a San Jose type of architecture into a very established and very old neighborhood in San Francisco and, essentially, to say that the Building Department finds no problem with this which was stated here on record and also part of the report has got to be a joke.

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This is -- this is going to change the entire neighborhoods in San Francisco and, unfortunately, because of the zoning in my neighborhood, this is going to have by far the greatest impact and I also want to bring to your attention that with inside the report, it says that this is going to require a lot of variances as far as bulk, mass, height and things of that nature.

Maybe not height, but there is some sort of formula with height relative to mass and stuff like that, and it is very important to note that this project will require all sorts of special variances which the report does not properly address and basically concludes are not a real problem.

The other issue that should be addressed and the reason we need a big report for the entire area and this report needs to include all the information about all the development is that the public transportation is not adequate for the neighborhood the way it is and there are literally about a hundred extra live-work units being added to the neighborhood right now.

And if you take that and add all the additional commercial development that this project would bring to the neighborhood as well as the retail development portion of this Project, it's a disaster waiting to happen and there is nothing in this report other than the specifics on what bus lines actually go to the neighborhood but nothing addresses

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the whole issue of transit and if it is adequate, if it meets the needs of the neighborhood.

The last point I want to make is that the building of this project is going to be severely disruptive to the neighborhood, and they are going to excavate down two stories and, of course, in a way that's a good thing because they are going to create extra parking but, at the same time, there is going to be so much dust and noise and, even though there are various methods on there stated in the EIR, practical experience and we have a lot of practical experience at this point in our neighborhood, dictates that it is going to be an extremely disruptive process and it needs a lot more further consideration and study and I won't take up any more of my speech on that.

Thank you.

THE PRESIDENT: Thank you very much.

Jul Niemier and then Kevin Keeting. Kevin, are you here? Okay, thank you. Go ahead, sir.

MR. NIEMIER: Yes.

I would like to second what Mr. Sutherland just said. The point is well thought out. So, I won't go on and on about the parking concerns.

I live, by the way, on 20th Street immediately across the street from where this proposed construction will take place, and I just want to augment what Mr. Sutherland

just said and what Tom said prior.

Right now, people park in my driveway all the time. People park on the sidewalk all the time.

I mean, we have got and I think a pretty bad parking problem right now. We need much more parking, in my opinion, for the development that is currently taking place.

I just foresee a lot of tow trucks in my neighborhood, a lot of "call the Police", "people parking in my driveway in the future", but I'll just move on to -- the other gentleman covered the concerns about traffic and such.

I'm mostly concerned about the height of this proposed -- the proposed height of this building.

I feel it is completely out of character with the neighborhood. It is going to be significantly higher than anything else I have been able to measure near by.

As Mr. Sutherland pointed out. It is architecturally completely out of character with the neighborhood.

When I made the addition to my house, I had to go before an architectural review and that had to be by the Planning Commission and such.

I discussed this matter with two architects, one of whom I have employed quite a bit and both the architects I have discussed this with are quite familiar with the Project, the Bryant Square Project, that is, and they have led me to

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believe that some rather extraordinary interpretations of the Planning Code have been undertaken to allow the amount of square footage which has allowed the building height which was described just yesterday, how the 65-foot proposed height is technically potentially feasible by some rather extraordinary means and I just wish that the environmental portion of the Planning Commission would scrutinize this very carefully because it is going to be... This is an enormously tall building.

So, I'll conclude my comments at this point. Thank you.

MS. AVERY: Excuse me. Will you state your name for the record?

MR. NIEMIER: Yes. Jul Niemier.

MS. AVERY: Thank you.

THE PRESIDENT: Thank you.

Kevin Keeting?

VOICE IN AUDIENCE: I think he left.

THE PRESIDENT: Okay. Thank you.

Paul Lent? Paul Lent?

AUDIENCE: (No response).

THE PRESIDENT: Okay. B-O-T... something. I can't read the rest.

VOICE IN AUDIENCE: B-A-T-E-L T-I-B-E-S?

THE PRESIDENT: Is that the last name?

VOICE IN AUDIENCE: T-I-B-E-S.

THE PRESIDENT: Thank you. I'm sorry I couldn't read your handwriting. And is David Maltz here? Okay.

MS. TIBES: My name is Batel Tibes, and I work for The Woolen Company, the people mostly in the hi-tech industry.

My company and the people I work with do oppose this project.

We feel that it will totally change the character of the neighborhood. We currently work in a building that has been around probably for the better part of the last Century and the character has ... well, the building maintains some.

Currently, I have a disability parking permit and I have not been able to park anywhere within the area of the vicinity there since there are no disability parking spots within a five-block area, whichever way you go.

The effectiveness of that permit is pretty much lost, due to the situation.

I'm concerned not only for the future with the limited parking space that is provided but with the lack of planning for public transportation.

Many people in our office do drive to the job because they do not have the ability to take convenient transportation which is one bus line and anything else that

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provides them.

So, they are having to drive to work rather than willingly use public transportation due to the duration of the Project which will not only eliminate current parking spots on the street but also around the building.

It will also make other ones, as the construction teams comes in and works on this building for the amount of time that it takes which will probably require considerable.

So, you are talking about the elimination of most likely a hundred parking spots for a few years into the future and not providing the provision of additional parking spaces as this building is developed along with the -- let me take the privilege of saying -- the ugliness of the building.

Everybody has been polite about it, but it is so unlike San Francisco that it is kind of disheartening to see these kinds of things going up.

Even though it does cater to my occupation, I would still rather not see these kind of things going up and even in the areas that do allow the situation, these kind of buildings to go up.

Please, the architects should have kept that in mind when they designed the building to accommodate visually what is going on and not totally destroy the neighborhood and for the people who want to enjoy their lives.

And to maybe to integrate business into the

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community, I think it might be less antagonism going on between those who earn a living in the kind of place there and those who live in the area and maybe they can work together because, ultimately, some will delegate going into neighborhoods from people who work in this area.

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This is going to be totally directing it. Especially if we talk about child care situations. There are no provisions for these kinds of facilities in these buildings or anything that would give back to the community.

THE PRESIDENT: Thank you.

David Maltz? And then Gisele Paris.

MR. MALTZ: My name is David Maltz. I'm also a resident of the neighborhood and opposed this project.

I will keep my comments fairly brief. I'm echoing and I join in the chorus here. I agree with most of the comments here on parking, the architectural integrity of this project.

I want to point out that other projects, other office developments recently in the neighborhood, the Kansas building, the help that was standing in developing and in creating the neighborhood have all been done with some modicum of respect for the local areas and the neighborhoods they are in and, in fact, more than anything else should be taken into account when considering the master plan for the City, for this neighborhood, is the height restriction.

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If you look at the buildings around the Bryant Square building, they look nothing like the glass and steel monstrosities that can be drafted on if this building project goes through.

So, I just encourage you all to think carefully about the completion of this Project. If this is done to my mind very speculatively, if it comes -- bottoms out and in the not too distant future, it will be cut and graded out. It will be a mitigated glass and steel monstrosity movement.

We will not be able to get rid of it and it will permanently alter the character of the neighborhood.

Thank you.

THE PRESIDENT: Thank you.

Gisele Paris? I don't have any more speaker cards. If there is anyone else who wishes to speak, will you please come towards the front of the building? Thank you.

MS. PARIS: Hi.

My name is Gisele Paris, and I'm a resident and a business owner and I'm just across the Bryant Square Project.

This is a heinous monstrosity. Having lived through the renovation of the Mill Building, the proportions of this project compared to that are, of course, ten and twenty fold.

That project was horrible for the local residents to have lived through.

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There is one line in particular in this environmental impact report which I think sums up a lot of the sentiment and that is ... It is interesting.

It says "the project sponsor shall require that the contractors haul and delivery routes to avoid residential streets wherever possible".

Let's think about that for a moment. How is that possible in the middle of the Mission? Residential streets surround this project.

There are houses on all four sides. Houses that will all be half the size of this building when this is completed.

This thing is huge. This is the... You could compare it to a skyscraper in downtown. That's the impact it will have on this neighborhood.

I realize realistically that it is impossible to impede progress, that something will go into this block whether we like it or not.

Sort of like the Mill Building, no one likes that. No one likes what is in there now because it is not suited for our block. We have been told it is not part of this block at all, especially where it is.

It makes the residents really weary of a project like this because we have told of other things before that haven't been true.

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This environmental impact report is just full of stories just like that.

It is not true that the access routes of delivery trucks and the people working on the project will try to keep the noise levels and the dust levels down.

How is that possible for a four-story building that takes up the entire city block? It is just not realistic.

It is going to be huge. It is going to go on for a long time and the residual affects as the other people spoke earlier are going to be long long term.

It will change the face of this neighborhood forever. It already has. The other construction in the neighborhood has and it is not pretty.

I mean, if you try to live and work in this neighborhood just over the last few years, it is just deadly.

It is not a pleasant thing anymore to have to jog for parking. We call them "parking vultures". I mean, the minute you go near your car with a key in your hand, there are three or four, you know, surrounding you.

So, obviously, you know, it is not just a parking issue. It's is a huge problem. It's the noise, it's the dust.

It's the ... the skyline will be changed forever, turning our streets into dark corridors by the huge shadowing effects this monstrosity is going to have and it is ugly.

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You know, we have beautiful Victorian houses along with old historic light industrial buildings.

That's what the neighborhood once was and now there are all of these architecturally -- I'll not say irrelevant because I'm sure they were well designed but they are not in keeping with the neighborhood at all.

They are -- this building, in particular, is really inappropriate, exclamation point. Thank you.

THE PRESIDENT: Thank you.

Joshua Cohen? And then Jonathan Youtt.

MR. COHEN: Good afternoon.

My name is Joshua Cohen. I live at 2206 Bryant which immediately faces the southeastern portion of the Project and I do have some written comments that I would like to enter into the record. So, I'll give these to somebody.

I would like to comment on the visual quality of the Project as it will affect the community but, rather than trying to describe it, I did take this opportunity in a recent drawing to just sketch out what's there now and what's planned and one alternative that I came up with which might be a possible design would be arrived upon by community situation, where there was a community impact report or a collaborative planning process that involved the community.

So, I'll just hand these out. If you want to take a look, that's great, and I'll just mention a couple of

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reasons why it is important. On the reverse side of the sheet, same thing.

I live directly over the top of the laundromatt and all day there is parents doing their laundry and little kids playing out in front of their doors and there is going to be a large increase in traffic from a project this size.

I think that should be addressed in the community for what effects that is going to have and you have to give the community a chance to give some mitigating factors to the development.

On York street between 19th and 20th, there are a whole string of houses that have high stoops that captures the afternoon sun where they can get together and talk and meet neighbors and they are going to lose the afternoon sun in the latter day because of the height of this building.

I haven't heard anyone address that and I haven't seen any of those families here because they have never been given the opportunity to have any input in this process.

So, in conclusion, I just would like to say that when the environmental report talks about the community and says there will be no impact, that's shortsighted and the environmental impact report should find that there will be significant impacts and address, you know, make arrangements for a collaborative planning process in the community.

Thank you.

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2a

THE PRESIDENT: Thank you.

Jonathan Youtt? And then James Corcoran.

MR. YOUTT: Hello. Thank you.

My name is Jonathan Youtt and I'm part of a group of artists that rents a ten-thousand square foot warehouse on Bryant between 18th and 19th. The name of the space is called "Cell Space".

We have a number of youth programs and adult programs that will be impacted by the scope of this project.

I want to take the opportunity to recognize that there is community development examples and models around the country that could be utilized by the SKS group and the other developers that have this and it is kind of -- it is an insult to the group of people that have lived in the neighborhood for years that are doing business and it is disrespectful and I feel like it is an opportunity for the developers to get input and see what the neighborhood actually needs instead of being just presumptuous and speculative.

So, I want to encourage, if anyone from SKS is here, to read about community development and to think about that process and redesign their facility with our input because there are definitely needs that are not being addressed in a project of this size and scope.

I also want to point out that it feels like we are

at ground zero for development in this day and age in the gentrification and in the big technology revolution that is happening.

It is fact, but we are looking at two major buildings being renovated just within two or three blocks of this site.

The Best Foods Management building, again, and the Pottery Barn is going to be bringing in their research and development group and that's going to be five hundred employees right on 18th and Bryant and then at 23rd -- at 2300 Harrison, at 19th and Harrison is another.

It is a website development group. There is another five hundred employees, and they have about twenty spots, twenty parking spots for five hundred employees right there at 19th and Harrison.

So, in lieu of the rest of the neighborhood, it seems like this Project should be redesigned with the input of the neighborhood to reduce the effects of the parking issue as well as to empower the neighbor and provide for the neighborhood instead of just going in there with reckless abandonment.

So, I appreciate your listening. Some people have asked me why I continue to come to these meetings when it seems like it falls on deaf ears and, no insult to you, but I still feel like I'm in a democracy and this is a place for

me to be heard and this is a place for all of us behind me to be heard and I really really thank you for spending the time listening to us and I certainly hope that the deal isn't done and that this is the place where we can be listened to.

Thank you.

THE PRESIDENT: Thank you. James Corcoran and then Teri Matelson.

MR. CORCORAN: Good afternoon.

I'm going in concurrence with the previous speaker's comments.

I speak well qualified. I am the senior resident at 2121 Bryant Street. I have had a studio there for twenty-five years, and I beseech the Planning Commission to re-examine the public conscience in regard to this matter.

Twenty years ago, we had sixty, sixty-five artists in the building, all contributing to the culture of San Francisco, all blending into the community, having a good social retrospect and then the greed came along and slowly but surely the property is being converted.

I speak from that side as well. In fact, about fourteen years ago, I bid on the property with a view towards preserving it and, as I stand here today, I seriously doubt that property will be preserved.

It can be and it can be a profitable one but not high profit and it will be a perfect blend with the rest of

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the community, socially.

We have lost the artists. They were intimidated by the move. Many of them left eight months ago, ten months ago.

We have only in the building now two left and they are moving out as I am and it is pathetic to see that quality of our life style go down the drain and there are many other ramifications of it but the most important thing is the social impact on the community and the people who have gone in there and they have restored some of their Victorian homes in good beautiful fashion and it is a pleasure to walk through the community.

It is a pure Mission the way it should be and not have a San Jose type structure come moving in on us and these comments are exclusive of parking and all of the other ramifications. They are just not going to be responded to.

Thank you.

THE PRESIDENT: Commissioner Mills?

COMMISSIONER MILLS: I just thought I would make a point of clarification that I hope I'm right about but often these photographs that are in the EIRs are not the actual project design. They are just a placeholder.

While we certainly hope that we have got a more sensitive design of the project than comes before us but often I will open these to think that, you know, "good

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grief!" But it is not the design of the actual building itself.

VOICE IN AUDIENCE: I think it represents the --

THE PRESIDENT: Thank you, Commissioner.

COMMISSIONER MILLS: It represents the potential bulk that it could get, but it does not necessarily represent the design represented by the project sponsor.

THE PRESIDENT: Thank you, Commissioner.

Teri Matelson and then Mary Bennett.

MS. MATELSON: My name is Terri Matelson, and I live near the Bryant Street office and I have lived there for about five months and I'm glad to be here.

I think that as far as saving the history of the buildings and so my issue is with the local field of this property and from the design, even though it is not going to be possible, that impact design, I think the bulk of it overshadows the historic building.

I think that's a shame. If they bothered to keep this property, the lost from this as to this degree, it would be nice to maintain the entire project with that idea in mind.

From the pictures and I don't know how accurate they are but there is a building on the corner of York and 19th and it covers up not only the windows of the units on that side but also where it says it is the Old Woolen Mill.

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So, it doesn't make a lot of sense to me and, if that is not going to happen, that's fine but, just in case it would, I think that is going to be a great loss and I think this is a huge building and I think the development should mean something to the neighborhood and in keeping with the character of this monument intact.

6b

And the other concern I have is with the shadows and light and, living in the lofts, I would hope that the development company would consider the quality of our lives since they have given us the opportunity to live in this nice historic building, that they would consider to have the light in the sky and with the mammoth of this building that concerns me that we wouldn't have that.

5e

So, I think it should be considered and it may have been considered and are not shown in the pictures but, just in case, I would like to bring those things forward.

Thank you.

THE PRESIDENT: Thank you. Mary Bennett? And then David Jayne and Kay Hoskins. I don't know if you are going to speak together or separate.

MS. BENNETT: Hello. My name is Mary Bennett. I live at 2641 - 20th.

I would like the Commission to consider the destruction to the neighborhood during the process before we talk about the size and scope of the building.

5d

All of the heavy equipment will have to come from either South Van Ness or from Potrero Avenue. It will come down 20th Street where a new high school is about to open in September or it will come down 19th Street.

Both of these are very residential. I happen to live on the corner of 20th Street. So, I'm very anti heavy duty equipment going down that street as it is.

It is also the street that UC uses for its shuttle which goes every fifteen minutes between UC and Parnassus and General. So, it is a heavily traveled street.

In addition to that, over the last year, I have after living in the Mission since 1978 had to have cars towed from my driveway on an average of three times a month.

Now, that's not, you know, opening the windows and yelling at people "do not park here!"

It is not waiting fifteen minutes hoping they are going to come back. That's if I need to exit my house, I have to call a tow truck.

So, if you think about the size of the Project and you think about, "oh, it is only going to be five stories, we are going to set back on the top," you're still going to have to walk around down on the bottom and it is huge. Seriously, if we can do something about the size, not even if nothing is going to be built there.

In addition to the parking problem, as I was taking

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public transit to this meeting, I walked by 19th and York, that is the opposite corner of where the project is, same block, and I picked from the telephone pole this flyer.

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7c

It says "desperately seeking parking. Monday through Friday, 9:00 to 5:00, rent your loft parking space during the day while you are at work. Make an offer. Call Carol," and it gives a phone number.

So, this is today. Today we have these signs on the telephone pole saying "desperately seeking parking" in the same block that this building is about to be built.

I ask you seriously please consider the neighborhood, the shadows, the size and the fact that we are going to be grossly inconvenienced.

2a

In closing, I would just like to say and be heard, other parts of the lot, also the same developers where Carrie lives in the loft, where there are only maybe fifty parking spaces, maybe a hundred for the lofts.

7c

They have been promised that they'll have valet parking for a minimum of fifteen months while the construction is going on.

So, those spaces will be taken away. Those cars will be put on the street. You know if they are going to be valet, it's going to be ... you know, it will have to be close.

So, there will be other neighbors who will have

less places to park. So, if they are already promised the other half of the block, they will be taking the parking spaces that they have been given, that they will be valeted for fifteen months. Think about the ramifications on the rest of us.

Thank you.

THE PRESIDENT: Thank you. Is it David Jayne?

MR. JAYNE: Thank you.

I'm David Jayne, J-A-Y-N-E, speaking on behalf of my wife and myself.

We have lived at 908 Potrero Avenue for eleven years now. We oppose this Project.

First of all, do you have a Jim McCormick in your Department? Because I tried to e-mail your Department a few days ago and got his name. Anyway, I will read you that e-mail then.

Regarding Item 12 on the agenda for the January 6th, 2000, planning meeting, please don't allow fulfillment of the proposed Bryant Square Project to be built at the corner of Bryant and 20th Streets.

The architecture will clash with the existing character of the neighborhood. The proposed height and intent to build the structure right up to the property line will block direct sunlight and used for numerous existing properties. Parking congestion will almost certainly

increase.

Also, I don't believe this project is geared towards the artistic or industrial populations which currently occupy the space.

Again, no on Item 12. I guess that's it.

THE PRESIDENT: Thank you very much.

Andy Hope and, after Mr. Hope, Simone Eastwood.

MR. HOPE: Hello. My name is Andy Hope.

I guess all of the prospective glass that's been proposed has been addressed.

I'm a recent owner in the Mission now. I have lived there and owned property there for a little over a year. I used to live there for seven years and then went to South of Market. I'm a designer and an engineer and an artist.

I watched the South of Market design community pretty much get eliminated because it had no voice. Rather than just complaining about progress because I'm part of the progress, I got a job.

I gave it to my business, got involved, acquired a building with some friends, set up a community to create a small anchor community for the designers and artists at grass roots level but what I am seeing happening in the Mission, it is really hard to fathom.

So, I'm guess I'm making a plea that to think about

it. It says in there to create less parking spaces, create more jobs in the neighborhood.

2a

I talked to all the people around there in the neighborhood and they tend to drop the other one down. So, I kind of question the validity of it. That's it.

THE PRESIDENT: Thank you.

Simone Eastwood?

MS. EASTWOOD: My name is Simone Eastwood, and I currently reside at the corner of 19th and Hampshire and I, too, feel that all of the issues have been addressed here but my concerns really are for the people that are not here, the people that are not even notified of this project taking place.

3b

People on my street, families, families that have lived there for years and years with children, and it is a changed neighborhood.

It doesn't fit in, a building from a meeting mall in San Jose, and I'm also concerned about the shade that we would be experiencing in the evening much earlier and when you bring a lot of darkness to this neighborhood that is wonderful and lively and residential and that's all.

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THE PRESIDENT: Thank you.

Does any other member of the public wish to give information on the planning? Anyone else after Ms. Hestor, just move up to the front of the room, please.

MS. HESTOR: Sue Hestor on behalf of the San Franciscans For Reasonable Growth.

I'm going to start with Page 2 dash 4, the project description. I want displacement information, very specific; the exact name of businesses there were in this building, what product do they produce, whether women or minority owners, how long were they there? How many employees do they have? And what rent do they pay?

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All of the descriptions of what's been there which has been eliminated is grossly general and needs to be much more explicit.

Throughout the entire document, including on this page every time the word "office" is used, staff should say whether it is a legal office within the terms of Proposition M.

4f

Accessory offices and manufacturing facilities are not offices. The City is using the term "office" much too loosely to give the impression that this is just a continuation of former legal office uses and that is not the case.

Every time you describe the height of the building with floors given in feet as well, starting on that page and throughout the document.

1a

On both Pages 2-5 and 2-6 where you have the little drawings of the buildings, you should put the street address

1b

on every single one of these little buildings because it is impossible to understand this document.

1b

You can't go back to a map and figure out what building they are talking about.

On Page 2 dash 14 -- on Page 2 dash 12, Project Sponsors' Objectives, No. 1 should be the honesty, make a lot of money.

1c

They are not in this for a charitable enterprize. They don't really care about assisting the historic urban institutes character of the block.

The goal of the developer is to make a lot of money and that is it. Without that, nothing else on that list is relevant.

On Page 2 dash 14, this is another place where, one, the office issue should be pulled out and talked about.

4f

Proposition M changed the definition of "office". The only office definition that makes this legally relevant is pre-existing offices defined in Prop M.

I want you to put that part of Prop M in here. The second thing is that it is extraordinarily insulting that you say page after page of general plan policies, and you put suppress priority policy into general characterizations that aren't even accurate statements in the policy.

2f

Pull out the exact language of the Prop M priority policies because those are the policies of the voters of the

City more than the general plan policies are. They are higher than that.

In particular, the gross misstatement of the one that should read that an adverse economic base be maintained by productive or industrial and service centers from displacement due to commercial office development and an opportunity for residential employment and ownership in these sectors should be enhanced.

That is a policy and that is a hundred and eighty-eight degrees away from this Project.

This Project displaces those uses and brings in monolithic commercial office development as well as a policy about protecting the neighborhood character.

Put those down. The staff is too sloppy about Prop M. You have boilerplate and they are not right.

On Page 3 dash 2 where you have the zoning, you don't even discuss about the pending neighborhood zoning for this site.

Discuss the pending policies to rezone this as a housing area because downtown office buildings plunked into this neighborhood cannot be consistent with what you are talking about for mixed use only.

You must find land use conflicts. This is one of the most significant impact projects I have ever seen.

It dramatically changes the context of the Mission.

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4f

This is a commercial office development. It is further south than anything I have ever seen in San Francisco in the middle of residential areas. Look at this neighborhood. Look at all of RHs.

You have to find significant land use impact. You have to find significant economic dislocations.

On Page 3-4, to the extent that you can do it, put down rental housing. This is a map of rental housing units? Rental versus ownership and that has a significant impact because, if all of these people can't find parking, they find it difficult to get to their jobs, they are going to buy up housing.

They are already looking at displacements and are going to have owner movements.

So, we have lot of vulnerable housing stopped and it isn't even on the radar screen.

THE PRESIDENT: Thank you. Next speaker?

MR. FIELDER: Jake Fielder.

Commissioners, I would like to reference 5.1. 5.1 which here reads as follows:

"With implementation of the mitigation measures --" this is at paragraph 3.

"With implementation of the Mitigation Measures outlined in Chapter 4.0, Mitigation Measures, no significant impacts would occur as a result

of implementing the Bryant Square Project.

"Whether or not the Project is approved, traffic volumes and transit loading in the site vicinity are projected to increase.

"Cumulative increases in traffic congestion may in turn cause cumulative increases in criteria air pollutants and a degradation of air quality.

"The project's incremental contribution to these potential cumulative effects would not be considered to be (quote) 'considerable' (unquote) or significant."

I think it is time for you to really address the California Environmental Quality Act in a serious way.

When CEQA, as it is known by the acronym, says that you should consider the cumulative effects, you really should do it.

Do you know that there is a past history and anybody who does a statistical analysis can tell you all you have to do is look at something that's happened in the past and, if you are going to continue to do that in the future, you don't have to make up a management policy.

You actually have evidence of which the community looked at with something like it because you have it in front of you with consistent reality.

If you would look and see what the cumulative impacts have been with certain kinds of land uses that are analogous to this one and I think if you even look now at the hodgepodge kind of land use projects that you have for residential, and information which is really, you know, office buildings turned on their side, there have been in some of our area and something like live-work, whatever you want to call that that had the multiple units, the whole issue down there is creating what is really causing an embarrassment and a confusion for the city.

I would hate to think that we would go over into the western of the side of the City and impose the kinds of land use conflicts that we are getting over on the eastern side in some of our areas of the City.

We would all be screaming bloody murder over there because I live over on the western side of the City and the whole thing is kind of a messy mystery.

So, if you could actually insist in this environmental impact report that cumulative impacts and be agreed to be spelled out and that they be known and that they be shown to be possibly significant, that would be a major step in the direction of actually using CEQA to describe reality.

The other area that CEQA also has to look at is the area that comes under the phrase "community controversy".

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I think we have always community controversy with this stuff and a much more detailed history and narrative on the community controversy would indeed be within the scope of what CEQA requires and, if you do that, that would be extremely useful that we would understand what the language shift versus the land use maintenance kinds of realities are and really get the proper description rather than just gloss over things and take off "yes", "no", and things like that and these various comments.

Thank you very much.

THE PRESIDENT: Thank you.

Next speaker? Does any other member of the public wish to address the Commission on the subject?

AUDIENCE: (No response).

THE PRESIDENT: Seeing no public comments, Commissions, Commissioner Richardson?

COMMISSIONER RICHARDSON: Thank you.

The EIR addresses the long term environmental impact which is fine.

However, there is nothing that I see here that actually addresses the temporary environmental impact and I'm talking about noise, traffic, dust, and I would like, you know, the Director to point me out -- to explain, you know, why because I have some suggestions to try to make it the adverse impact on the, you know, the residents in the

community. I think that this issue is not telling the voters the cumulative impact.

So, if you can help me address that issue, please.

MR. GREEN: Well, again, I think that, Commissioner Richardson, if your comment is that you would like to see the discussion with regard to impacts that are related to construction either bolstered, if you don't think the discussion is adequate or you are going to make a determination that there is no discussion at all, you need some, I do believe that every Environmental Impact Report clearly talks about what transpires during construction and I believe that it's Section 4 of this document.

It does talk about construction and so I guess my suggestion to help you in you shaping your comment would be that if you in looking at Section 4 do not believe that that is an adequate discussion about the impacts related to construction, then focus your comments in that fashion, please.

COMMISSIONER RICHARDSON: Exactly, and I do not believe that the explanations of -- given in either item section adequately addresses the temporary environmental impact report and I would like to see stronger language there.

Most of the discussions from the community actually essentially no doubt and I think for me there is definitely

for me a significant adverse effect that needs to be addressed, you know, during the construction for such a Project with, you know, this magnitude.

THE PRESIDENT: Thank you, Commissioner.

Anyone else? Commissioner Antenore?

COMMISSIONER ANTENORE: Yes.

I have read this environmental -- this draft environmental impact report.

It seems to me to be quite obvious that a building of this size and this nature that is going to be in a neighborhood that is already very very impacted and having a lot of problems, many of them particularly in regards to the transit questions for the area, the parking questions, general transportation issues.

I thought I needed to look at the mitigation section in the EIR to see what proposals there were with dealing with what I could see as obvious impacts.

So, I went to the mitigation section and I read it very carefully and all of the mitigation proposals save one relate solely to the question of construction impacts and those not very -- in very thorough fashion, and the one mitigation measure that was considered that didn't relate directly to construction impacts essentially changed the timing on one traffic light at one intersection and that's the only mitigation measure that is stated to be needed for a

project like this in this Environmental Impact Report and the justification for that is that, again, back to the old question of cumulative impacts that we see the EIR after EIR after EIR is that we don't need to consider these mitigations because the specific impact of this Project is not incrementally great enough to justify us having to mitigate the impacts.

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So, we, again, add to our big stack of EIRs which I have saved in my office since I have been on this Commission. I have shelf after shelf after shelf and I have kept them on purpose.

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Every EIR on top of every EIR on top of every EIR says the same thing about this question and we never get to the overall issues and this is an area where clearly the overall issues cannot be swept under the carpet so easily by simply saying that this particular Project doesn't add enough cumulative impact to justify us dealing with it.

When do we get to the point where we deal with it? There has to come a point where we are dealing with real issues that effect people in these EIRs and come up with real solutions and real proposals for dealing with the way people's lives are affected and this area uptown is obviously being impacted in a major way socially, environmentally, economically, transportation, every issue you can think of practically in terms of urban planning are going on this in

area right now and we seem to be simply saying, "yes, we acknowledge that there is something really significant happening here" but, when we come to analyzing it in an Environmental Impact Report, this is not -- we say somehow this is not the place for us to deal with this.

Well, if this isn't the place, where is the place? I think there comes a time when we have to pull up our heads out of the sand and say we have got a lot of problems that we have to deal with and we need to seriously consider what we have to do to make things work.

I'm not saying this is a bad project or a good project or a project that ought to be approved or ought not to be approved.

But, clearly, if we are going to have a project like this approved, you have to do things in order to mitigate the impact of the project and the Environmental Impact Report process and the whole CEQA process ought to be a place where we identify the things that we need to do and to simply say we don't need to do anything is crazy.

It is not true. We all know we have to do something. Everybody in this room knows we have to do something.

I'm literally getting sick of going week after week after week and saying something like what I have been saying now without us really getting to the point where we are

dealing with the real issues.

So, my criticism of this report is basically that and I don't need to repeat all the things about the aesthetics of the building and everything else which I think are terrible.

I think that the light and the air and the sunlight issues are clearly in order here and that's something that the neighborhood deserves to have some explanation of in the Environmental Impact Report so that when it comes time for us to approve or disprove this Project or to modify it or whatever, that we have adequate information in that area to be able to deal with those questions.

I'm also interested in some explanation in the EIR as to the history of how it is that this entire area surrounding this site has a fifty-foot height limit and this particular lot sitting in the middle of that neighborhood has a sixty-five foot height limit.

I'm curious as to how that happened and that's the end of my comments.

THE PRESIDENT: Thank you, Commissioner.

Anything else, Commissioners? Okay.

I want to thank everybody who took the time out to come here and give their comments and they will be processed and anyone here who has any written comments, if you can get them to the secretary at 1660 Mission Street by 5:00 o'clock.

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We will take a five-minute break.

(Item 12 Ended At 4:22 p.m.)

RESPONSE TO COMMENTS

4.1 INTRODUCTION TO RESPONSES

The following are listed responses to comments by topic, and the page number where the response starts in this section. These are the responses to comments referred to in Section 3.0.

Topic	Page No.
1. Project Description	C&R 4-4
a. Project description	C&R 4-4
b. Project plans	C&R 4-6
c. Project sponsor's objectives	C&R 4-7
2. Approval Process / Plans	C&R 4-8
a. Project approval process	C&R 4-8
b. Parking variance	C&R 4-9
c. Valet parking requirement	C&R 4-10
d. Child-care	C&R 4-11
e. <i>General Plan</i>	C&R 4-11
f. <i>Proposition M</i>	C&R 4-12
3. <i>California Environmental Quality Act (CEQA)</i>	C&R 4-13
a. EIR adequacy	C&R 4-13
d. EIR process	C&R 4-15
4. Zoning and Land use	C&R 4-16
a. Zoning: housing	C&R 4-16
b. Zoning history	C&R 4-17
c. Height, bulk, floor area ratio (FAR)	C&R 4-17
d. Rental housing	C&R 4-18
e. Open space	C&R 4-19
e. Land use	C&R 4-19

Topic	Page No.
5. Visual Quality and Shadows	C&R 4-23
a. Visual quality	C&R 4-23
b. Visual simulations	C&R 4-24
c. Views	C&R 4-24
d. Building size	C&R 4-25
e. Shadows	C&R 4-26
6. Historic Structures	C&R 4-27
a. 2101 Bryant Street	C&R 4-27
b. The Mill Building (720 York Street)	C&R 4-30
7. Transportation	C&R 4-31
a. Parking demand/supply	C&R 4-31
b. Parking meters	C&R 4-34
c. Parking congestion	C&R 4-35
d. Parking ingress/egress	C&R 4-37
e. Visitor and delivery parking	C&R 4-37
f. Parking counts	C&R 4-38
g. Disabled parking	C&R 4-39
h. Traffic counts	C&R 4-39
i. Traffic methodology	C&R 4-40
j. Project trip generation	C&R 4-40
k. Traffic mode split	C&R 4-41
l. Intersection conditions	C&R 4-41
m. Traffic congestion	C&R 4-42
n. Garage entrance impacts	C&R 4-43
o. Transit commute	C&R 4-43
p. Transit service	C&R 4-43
q. "Transit First" policy	C&R 4-45
r. Pedestrian analysis	C&R 4-45
s. Freight loading	C&R 4-45
8. Construction impacts	C&R 4-46

Topic	Page No.
9. Growth Inducement	C&R 4-49
10. Population \ Employment	C&R 4-49
a. Existing vacancies	C&R 4-49
b. Business displacement	C&R 4-50
c. Employee densities	C&R 4-52
d. Employment	C&R 4-52
11. Economic Impacts	C&R 4-53
a. Property values	C&R 4-53
b. Neighborhood economic impacts	C&R 4-53
12. Geotechnical Impacts	C&R 4-54
13. Noise	C&R 4-54
14. Fire safety	C&R 4-54
15. Quality of life	C&R 4-55
16. Community controversy	C&R 4-55
17. Cumulative Impacts	C&R 4-56
a. Cumulative Development	C&R 4-56
b. Cumulative local air quality	C&R 4-59
18. Mitigation Measures	C&R 4-59
19. Significant Effects	C&R 4-62
a. Significant parking impacts	C&R 4-62
b. Severe environmental damage	C&R 4-63
20. Alternatives	C&R 4-63
a. Alternatives: Reduced Height	C&R 4-63
b. Alternatives: Industrial	C&R 4-65
c. Alternatives: Design	C&R 4-65
d. Alternatives: Reduced Parking	C&R 4-66
e. Off-site Alternatives	C&R 4-66

4.2 RESPONSES TO COMMENTS

Below is the text of the responses to public comments. Where text changes to the Draft EIR are indicated, these are also repeated in Chapter 5.0, Text Changes to the Draft EIR, above.

1. Project Description

Response 1a – Project description

The project would include about 9,550 square feet of retail that is intended to serve people in the immediate area. The office uses would be market based, and the project sponsor would not have control over employees hired by the tenants. The project as originally proposed did not include office space set aside for community-based organizations.

The project has undergone several design changes. One of the commenters is correct in stating that the square footage of the project did not change between the Initial Study and the Draft EIR, although the design in the Draft EIR showed a larger building. This was an error. Since publication of the Draft EIR the project has been redesigned and is included herein as the Increased Parking Variant to the Parking-Demand Compliant Alternative. (The new design may be seen in Section 5.2 Addenda to the Draft EIR under changes to Section 6.5 of the Draft EIR.) The project as currently proposed would contain 152,840 square feet of office, 1,500 square feet of retail space, and 4,700 square feet of light industrial space, for a total of about 159,040 gross square feet.

The following changes have been made to the Draft EIR to clarify the total number of parking spaces (revisions are underlined, deletions are striked out):

Page 1-5, paragraph 4: "...When compared to the estimated 309 space parking demand, the 301 total parking spaces ~~(including valet assisted space and minus 16 spaces reserved for 720 York Street live/work units)~~ (203 independently accessible, expanded to 301 through on-site valet-assisted parking) provided for the Bryant Square project would result in a 24-space shortfall. This accounts for an allocation of 16 parking spaces to the 720 York Street live/work project. When comparing this parking demand to the 203 independently accessible spaces, a 122-space shortfall would result (accounting for allocation of 16

parking spaces to the 720 York Street project.) The result of the parking shortfall associated with the development of the proposed project would be increasing competition for limited on-street parking, which is currently near or exceeding capacity.

Page 1-15, paragraph five: "...The underground parking garage would provide 260 independently-accessible (or 306 valet) parking spaces on 3 subsurface levels, compared to 203 independently-accessible (or 301 valet) parking spaces on two ~~parking~~ levels with the project."

Page 2-7, Bullet E, third sentence: "Two subsurface levels would be excavated under this building and the adjacent courtyard for an underground parking garage containing 203 independently-accessible ~~and 301 valet assist parking stalls~~ (expanded to 301 spaces through valet-assisted parking operations) in about 61,850 square feet of space."

Page 3-31, third sentence of the second to the last paragraph: "The Bryant Square project proposes to provide a total of 301 valet-assisted parking spaces (or 203 independently accessible parking spaces) on-site to serve the needs of both the Bryant Square project and the recently constructed 720 York Street live/work units."

Page 3-33, paragraph two, sentence three: "This represents a surplus of 13 spaces above the code required parking for the Bryant Square project. When compared to the estimated parking demand, the 301 total parking spaces (including valet-assisted spaces) (or 203 independently accessible spaces) provided for the Bryant Square project would result in a 24-space shortfall...."

Page 6-2, the last sentence under Description: "This alternative would provide 102 independently accessible or 145 valet parking spaces on one parking level, compared to 203 independently accessible or 301 valet parking spaces on two parking levels with the project."

Page 6-7, the last sentence of paragraph two under Description: "The underground parking garage would provide 260 independently-accessible (or 306 valet) parking spaces on 3 subsurface levels, compared to 203 independently-accessible (or 301 valet) parking spaces on two ~~parking~~ levels with the project."

The 2101 Bryant Street building would be about 55-feet tall to the top of the addition, and the 2125 Bryant Street building would be about 65-feet tall at its highest point. The Draft EIR has been revised in several places to clarify this (revisions are underlined):

Page 2-4, Bullet A, second sentence, “A new partial fourth floor containing about 6,000 square feet would be added to the top, which would be about 55-feet tall.”

Page 2-7, Bullet E, first sentence: “2125 Bryant Street, a new approximate 122,050 square-foot office building five-floors (65-feet) tall would be constructed after demolishing the existing wood-frame structure at 2125 Bryant Street and the metal shed behind it at 2850 - 20th Street.”

Page 3-9, last paragraph: “The five-story, 65-foot tall, Bryant Square project would be taller than other structures in the immediate area.

As noted by one commenter, the project is not geared toward the artistic or industrial populations which currently occupy the space. As stated on page 2-3 of the Draft EIR, “the project could potentially contain multi-media uses.”

The live/work project was approved before the project sponsor purchased the 720 York Street building.

(Comment letters 3b, 5k, 5m, 5v, 5x, 9j, 24c; Public hearing comments 27, 52, 58)

Response 1b – Project plans

The south elevation (Figure 4, page 2-8 of the Draft EIR) shows the same setbacks as can be seen in the Figure 12 visual simulation on page 3-12 of the Draft EIR. The west elevation and floor plans are also for the same structure. The west elevation (Figure 4, page 2-8 of the Draft EIR) at the fourth-floor level shows a setback for the 2101 Bryant building (the historic structure) and no setback for the proposed 2125 Bryant Street building. The west and south elevations show the 2125 Bryant Street building with a setback at the fifth-floor level, a floor plan of which is not shown within the Draft EIR.

Figure 3: Site Plan shown on page 2-6 of the Draft EIR was from an older design and does not reflect design changes shown in Figure 5: Ground floor plan or in Figure 6: Fourth floor plan, pages 2-9 to 2-10, respectively, of the Draft EIR. In response, the site plan has been revised as shown in Section 5.2 Addenda to the Draft EIR of this document as a change to page 2-6 of the Draft EIR.

Figures 2: Existing Buildings and 3: Site Plan have been revised to include the building addresses. These can be seen in Section 5.2 Addenda to the Draft EIR of this document as changes to pages 2-5 and 2-6 of the Draft EIR.

Since publication of the Draft EIR, the project sponsor has revised the building design, which is presented as a variant, Increased Parking Variant, to the Parking-Demand Compliant Alternative. A visual simulation is presented for the Increased Parking Variant in Section 5.2 Addenda to the Draft EIR, contained in this document, as changes to Section 6.5 of the Draft EIR.

(Comment letters 5j, 5u, 9h; Public hearing comment 59)

Response 1c – Project sponsor’s objectives

The *California Environmental Quality Act (CEQA) Guidelines* § 15124(b) states that the project description of an EIR shall contain:

“A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.”

Since publication of the Draft EIR, the sponsor has decided to include an additional project objective. Page 2-12 of the Draft EIR has been revised to add this new objective (additions are underlined):

“8. Develop a project that creates an adequate return for its investors and adequate security for its lenders.”

(Comment letters 9f, 31g, 34t; Public hearing comment 60)

2. Approval Process / Plans

Response 2a – Project approval process

As part of the City's approval process, the City could approve the proposed project, approve the project with conditions, deny the proposed project, or approve an alternative project. The City will consider comments on the merits of the project after EIR certification.

During the approval process, decision makers would consider whether the criteria set forth in the *Planning Code* for an exception to the bulk limit have been met. As discussed in Response 2b – Parking variance, decision makers will also consider either a variance or Planned Unit Development approval to permit *Planning Code*-required parking on a valet basis. The Planning Commission could impose conditions of project approval during the project approval process, including requiring that valet parking continue on site. See also Response 2b – Parking variance and Response 2c – Valet parking requirement.

The approval process first requires the review and disclosure of potential environmental impacts of the proposed project together with potential mitigation measures and feasible alternatives as defined by *CEQA Guidelines*. The Planning Commission determines whether all environmental concerns have been adequately addressed in the EIR. Only if the Planning Commission makes that determination, may the EIR be certified as adequate, accurate, objective, and complete. (Please refer to Response 3a – EIR adequacy, below.) No project approval action may proceed until after EIR certification.

(Comment letters 1b, 1c, 2k, 3d, 5s, 6b, 6g, 8a, 10a, 11a, 12b, 13b, 14a, 15a, 16a, 17a, 18d, 19a, 20d, 21a, 22a, 23c, 24a, 25d, 29c, 30j, 31d, 31n, 31p, 32c, 34b, 34e, 34v, 35a, 36d, 37c, 38c, 39c, 40c, 41c, 42c, 43c, 44a, 45a, 45h, 46c, 47c, 50a, 52a, 52e, 53a, 54a, 55b, 56c, 57a, 58c; Public hearing comments 8, 11, 36, 37, 38, 48, 50, 53)

Response 2b – Parking variance

The parking shortfalls discussed in Response 7a – Parking demand/supply, below, would require the developer to obtain an exception through the Planned Unit Development (PUD) process or to seek and justify a variance. This is because *Planning Code* required parking spaces would not be supplied in independently-accessible spaces; rather valet-assisted operations would be implemented. The approval of a PUD or a variance for the Bryant Square Project would be an independent action from certification of the EIR and would require an independent application.

Under Section 304 of the *San Francisco Planning Code*, for projects on sites of not less than one-half acre, the Planning Commission may authorize “a well-reasoned modification of certain of the provisions” of the *Planning Code*. Under Section 304(d) of the *Planning Code*, in addition to meeting the criteria applicable to conditional uses, a PUD must meet certain other criteria and limitations, including a requirement that the project “provide off-street parking adequate for the occupancy proposed.” The project as originally proposed would have provided the *Planning Code*-required number of parking spaces, on a valet, rather than an independently accessible basis, but would have resulted in a shortfall of 24 spaces below the parking demand generated by the project. The project sponsor has requested PUD approval of a project similar to the Increased Parking Variant to the Parking-Demand Compliant Alternative. If the Planning Commission authorizes the provision of *Planning Code*-required parking on a valet basis through the PUD process, the Increased Parking Variant to the Parking Demand Compliant Alternative would provide a surplus of 86 spaces above demand, assuming 45 spaces were allocated to the 720 York Street building. (See Response 7a – Parking demand/Supply for a discussion about *Planning Code*-required parking, parking demand, and supply for this variant.)

If the Planning Department determines that a parking variance is the appropriate action, the project sponsor must seek and justify a variance. The Zoning Administrator can grant a variance if the following findings can be made per Section 305(c) of the *San Francisco Planning Code*:

“(1) That there are exceptional or extraordinary circumstances applying to the property involved or to the intended use of the property that do not apply generally to other property or uses in the same class of district:

“(2) That owing to such exceptional or extraordinary circumstances the literal enforcement of specified provisions of this Code would result in practical difficulty or

unnecessary hardship not created by or attributable to the applicant or the owner of the property;

“(3) That such variance is necessary for the preservation and enjoyment of a substantial property right of the subject property, possessed by other property in the same class of district;

“(4) That the granting of such variance will not be materially detrimental to the public welfare or materially injurious to the property or improvements in the vicinity; and

“(5) That the granting of such variance will be in harmony with the general purpose and intent of this Code and will not adversely affect the Master Plan.”

(Comment letters 1b, 5g, 16e, 18c, 22b, 23b, 29a, 29c, 32c, 34e, 34q, 35a, 36a, 37a, 38a, 39a, 40a, 41a, 42a, 43a, 45f, 46b, 47b, 48j, 56b, 58d)

Response 2c – Valet parking requirement

As noted by one commenter, the project sponsor has proposed to meet its code-required parking obligations through the provision of valet-assisted parking. As described in Response 2b – Parking variance, this aspect of the project would require approval of a variance or Planned Unit Development (PUD). If the project is approved, conditions of approval would likely be attached to the project stipulating the continuance of valet-assisted parking to lessen the parking impacts and meet parking requirements. If valet parking is discontinued under these conditions, the project would not be in compliance with the project approval action and sanctions could be instituted against the project.

Given the relatively high occupancy levels for on-street parking in the area, employees to the site would have limited opportunities to park on-street whether parking was charged for or not. On the eastern border of the parking study area, residential parking permit areas have been established to limit long-term on-street parking spillover from San Francisco General Hospital employees into the neighborhood. The City could expand the residential parking program westward from Potrero Avenue and York Street to Bryant Street or beyond to provide further assurance that on-street spaces are reserved for residents and short-term visitors to the area rather than being occupied all day by Bryant Square employees.

Expansion of the existing Residential Permit Parking “W” area around San Francisco General Hospital to the west to incorporate the project area would have to meet the following requirements:

- 1) The proposed blocks must be contiguous to an existing Permit Parking Area;
- 2) A petition signed by more than 50 percent of the households on each proposed block must be submitted to the Department of Parking and Traffic;
- 3) At least 80 percent of the legal on-street parking spaces within the proposed area are occupied during the day, and
- 4) No existing meters shall be removed and replaced with Residential Permit Parking signs. Metered blocks may be included if a petition for a non-metered block is submitted at the same time.

When a request for expansion of an area is submitted to the Department of Parking and Traffic, it is reviewed at the staff level within the Department of Parking and Traffic and at Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT), and a departmental public hearing is held. The item must then be reviewed and approved by the Parking and Traffic Commission, the Board of Supervisors, and the Mayor. The legislation and sign installation process takes about six months to complete.

(Comment letters 2f, 2k, 2l, 34q)

Response 2d – Child-care

The project would not include child-care as part of the project. The Planning Commission can add conditions of project approval for which a nexus has been shown.

(Public hearing comment 21)

Response 2e – General Plan

The City’s *General Plan* provides general policies and objectives to guide land use decisions. The *General Plan* contains a number of policies related to the physical environment, many of which have been included on pages 2-14 to 2-18 of the Draft EIR. The project requires

Conditional Use authorization, which in turn, requires a finding of consistency with the *General Plan*. Determinations regarding consistency with the City's *General Plan* are within the purview of the Planning Commission, and are considered independently by decision-makers at the time of the public hearing on project adoption. Such determinations often require a balancing between different competing objectives and goals. Therefore, any potential conflict not identified in the EIR could be considered by the Planning Commission at the project approval hearing, and would not alter the EIR's evaluation of the physical environmental effects of the proposed project.

The significance criteria are contained within the Draft EIR and are used as a basis to determine whether the potential adverse physical environmental impacts of a project would be significant or not for purposes of *CEQA*. Competing objectives and goals of the *General Plan* are not generally used as a basis to determine significance of environmental impacts. The determination that the project would not have a significant effect on the environment does not mean that Conditional Use authorization or bulk exceptions should be granted.

(Comment letter 5b)

Response 2f – Proposition M

Proposition M policies are priority policies contained within Section 101 of the *Planning Code* that have been made the preamble of the *General Plan*. These policies are to be the basis upon which inconsistencies in the *General Plan* are resolved and are part of the *General Plan*. The eight priority policies follow:

“(1) That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;

“(2) That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;

“(3) The City's supply of affordable housing be preserved and enhanced;

“(4) That commuter traffic not impede Muni transit service or overburden our streets or neighborhood parking;

“(5) That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;

“(6) That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake;

“(7) That landmarks and historic buildings be preserved; and,

“(8) That our parks and open space and their access to sunlight and vistas be protected from development.”

The environmental analysis contained within an EIR examines the physical effect of a project both specifically and cumulatively with other proposed development. The EIR is not a forum to debate policy issues. The Planning Commission will consider the priority policies and the project’s relation to them during the project approval process. These policies are not part of the environmental analysis required under *CEQA*.

(Comment letter 5c; Public hearing comment 62)

3. California Environmental Quality Act (CEQA)

Response 3a – EIR adequacy

Under *CEQA* and Chapter 31 of the City’s *Administrative Code*, the Planning Commission must find an EIR to be adequate, accurate, and objective in order to certify completion of a final EIR. As stated in *CEQA Guidelines* §15151: “An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.” The EIR should provide a sufficient degree of analysis to allow decision-makers to make intelligent judgments. The decision of the governmental agency in determining the EIR to be adequate, accurate, and objective must be based on substantial evidence in the whole record.

This EIR is based upon substantial evidence (both within the document and within the administrative record) on which the City Planning Commission can determine whether project effects are significant. *CEQA Guidelines* §15384 states:

“a) ‘Substantial evidence’ as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.

“(b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

(See also *Public Resources Code* Sections 21083 and 21087.)

Under the *California Environmental Quality Act*, an EIR must be an unbiased document that, based on substantial evidence, is adequate, complete, and a good faith effort at full disclosure (*CEQA Guidelines* Section 15151). It is the responsibility of the Planning Commission to determine that the EIR is adequate, accurate, objective, and complete.

Where commenters have made specific reference to a section of the EIR which they consider to be inadequate, responses to those specific comments are contained in the responses under that section or topic. Where general assertions are made regarding content or process without providing evidence of any specific inaccuracies, the City can only generally respond to such comments.

The EIR process is the only required process under state law with which to disclose environmental issues. Other processes could be considered in the project approval process. See Response 2a – Project approval process for additional discussion.

(*Comment letters 2a, 2p, 18a, 18d, 31j, 34d, 34o, 51a, 51d; Public hearing comments 11, 35*)

Response 3b – EIR process

The public has many forums within which it may participate in the Draft EIR process. For this EIR the public was invited to submit comments in writing to the Planning Department or to speak at the public hearing. Comments on the EIR could also be made by fax or by e-mail. However, the Department is not required by *CEQA* or by local code to publish an e-mail address for comments. For people who are tardy in making comments, they may call the Planning Department to find out the fax number or e-mail address.

On September 4, 1999, the Notice that an Environmental Impact Report is Determined to be Required was published in a newspaper of general circulation. In addition, notices were sent to 43 neighborhood groups, 238 nearby property owners and residents, the public library, nine newspapers, the standard EIR distribution list, and anyone who requested notice.

On November 20, 1999 the Notice of Preparation of a Draft EIR was sent to the same groups and individuals who received the earlier notice, plus anyone else who requested notice. The project site was posted on November 22, 1999 with 15 notices advertising publication of the Draft EIR and the public hearing.

During the 47-day public comment period, 58 comment letters on the Draft EIR were either sent to the Planning Department or were submitted to the Planning Commission at the public hearing on the Draft EIR. In addition, 21 people spoke at the Draft EIR public hearing.

CEQA Guidelines §15087 provides guidance regarding Draft EIR public review process. As noted in §15087(i): “Public hearings are encouraged, but not required as an element of the *CEQA* process.”

CEQA Guidelines §15088 provides guidance regarding preparing responses to public comments:

“(a) The Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

“(b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

“(c) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the Lead Agency should either: (1) Revise the text in the body of the EIR, or (2) Include marginal notes showing that the information is revised in the response to comments.”

It is the policy of the Planning Commission and the Planning Department to respond to public comments in a complete and courteous manner, and to meet all requirements of *CEQA*.

(Comment letters 18e, 34a, 34d; Public hearing comment 54)

4. Zoning and Land use

Response 4a – Zoning: housing

As stated on page 7 of the Initial Study (Appendix A of the Draft EIR) the project site is located within an interim Industrial Protection Zone where new housing uses, including live/work projects, are generally not permitted. Those interim controls are expected to be replaced by permanent zoning controls. The replacement permanent controls are still being developed and would require public hearings before, and approval by, the Planning Commission as well as the Board of Supervisors.

Also, as stated on pages 11 and 12 of the Initial Study, the project would be required to contribute to the Office of Affordable Housing Production Program.

(Comment letter 34g; Public hearing comment 63)

Response 4b – Zoning history

The Planning Department has been unable to ascertain why the project block has a 65-foot height limit and surrounding blocks have a 50-foot height limit. The only known history of the site includes historic land uses (discussed in Response 4f – Land use) and historic structures.

(Public hearing comment 74)

Response 4c – Height, bulk, floor area ratio (FAR)

Several factors contribute to the total building size that is allowable under the *San Francisco Planning Code*:

A maximum Floor Area Ratio (FAR) is established for each district which determines maximum square feet of development that is allowable on a parcel per square foot of land area. In addition, height and bulk limitations are established that may further restrict the FAR. For the project site, the C-M (Heavy Commercial) District allows a maximum FAR of 9.0 to 1 and the M-I (Light Industrial) District allows a maximum FAR of 5.0 to 1. Thus the FAR for the project at four and five-stories tall would be less than the allowable FAR.

Second, the height limits determine maximum height that is applicable on a development lot. For the project block, the allowable maximum height is 65 feet. The project at its maximum height would be 65 feet tall and would comply with allowable height limits. The project does not have to obtain a variance to the height limit as stated by one commenter, because it would meet the applicable height limit for the project site. The *Planning Code* height limits are not variable and there are no special exceptions allowed for the project site. Buildings on the project site could be higher than surrounding buildings because the zoning on the project block permits a greater height than surrounding blocks with a 50-foot height limit.

Third, the bulk limits are established which determine the maximum bulk that is applicable on a development lot, usually above a certain height. The *Planning Code* also provides for exceptions from these limitations when certain standards are met. For the project site, the 65-B Height and Bulk District limits building bulk above 50 feet to not exceed 110 feet in length and 125 feet in

the diagonal dimension. The *Planning Code* allows bulk exceptions, on a case-by-case basis, as determined by the Planning Commission. As noted on page 3-5 of the Draft EIR:

“Above 50 feet, the proposed building on the corner of 20th and Bryant Streets (2125 Bryant Street) would measure about 202 feet in length and about 217 feet in the diagonal direction, which is greater than the allowable 110 feet in length and the 125 feet in the diagonal dimension. The proposed addition to the building on the corner of 19th and Bryant Streets (2101 Bryant Street) would measure about 138 feet in length and about 144 feet in the diagonal direction. Exceptions to the bulk limit would need approval under Section 303 or 304 of the *San Francisco Planning Code*.”

The fact that the project requires an exception to a *Planning Code* requirement does not mean that the environmental effects of the project would be significant. The EIR determined whether effects were significant based on the significance criteria and not on *Planning Code* requirements. Any exceptions to the *Planning Code* would have to be granted by the Planning Commission during the approval process after consideration of the standards set forth in the *Planning Code* to govern such exceptions. The Planning Commission must determine whether an exception would be allowed to the bulk limits during this process. See also Response 2a – Project approval process for additional discussion of the process.

(Comment letters 4a, 5a, 5b, 5f, 5h, 5n, 5r, 25a, 29c, 30b, 30i, 31g, 32a, 32c, 33a, 34i, 35a
Public hearing comments 15, 22)

Response 4d – Rental housing

Ownership patterns of housing are not used in the transportation or parking studies and are not relevant to the environmental impacts of the proposed project. Many factors determine whether a renter will become a homeowner, including saving for a down payment, total income, credit rating, and desire to own a home, among others. If a residential parking program goes into effect in the nearby residential neighborhoods, renters as well as owners could take advantage of this program.

(Public hearing comment 66)

Response 4e – Open space

Under the *Planning Code*, open space is required to be provided in a C-M (Heavy Commercial) District or M-1 (Light Industrial) District only for dwelling units.

The project would provide about 10,000 square feet of interior open space that would be open to owners, tenants, neighbors, and community businesses during working hours. Landscaping, paving and lighting would be provided, along with potential seating. Through-block access would be available during this time from 19th Street to 20th Street. This area would largely be in sunlight during the noon hour at all seasons of the year.

The proposed project does not include public open space on the corner of 20th and Bryant Streets, for a variety of reasons. The inclusion of such open space would not reduce or eliminate any significant environmental impact identified in the Draft EIR so an alternative with open space on the corner would not be required. In addition, open space in that location could not be secured in the same way as open space interior to the project site. This location could be problematic not only for the building owners, but also for the residents of the adjacent residential neighborhood. Refer also to Response 20c – Alternatives: Design

The existing paved area on the corner of Bryant and 20th Streets is not open space; it is vacant industrial/commercial land used for parking and storage.

(Comment letters 5e, 5q, 34l, 34o)

Response 4f – Land use

Most of the project site is located within an industrial zone with a portion in a heavy commercial zone as shown in Figure 8, page 3-2 of the Draft EIR. The project block has been developed with industrial and commercial land uses since the late 1880s when the entire block contained the Golden Gate Woolen Manufacturing Company. By 1914, much of the block was developed with industrial and commercial uses: the City of Paris Dyeing and Cleaning Works, California Shade Cloth Company, Delsol Wine and Liquor Merchants and the Hotel Owners Laundry

Company.¹ The building at the corner of Bryant and 19th Streets had been constructed in 1920, and occupied by the Frank & Hyman Shoe Manufacturing Company.² More recently, the buildings on the project site have been developed with smaller commercial and industrial land uses contained within several structures on the project block. Thus developing the project site with a new commercial land use would not appreciably change land use on site or within the area. Commercial/industrial buildings were on the project site or in the project area before most of the existing housing in the neighborhood was constructed.

The project would include about 9,550 square feet of retail that is intended to serve people in the immediate area, including on the project site. These would be small-scale retail uses and would not expect to compete with area-wide or regional retail uses that would be found in Potrero Center and similar retail concentrations.

Land uses proposed as part of the project would not “divide or disrupt an established community” because it would be a replacement of other commercial and industrial uses. Land use changes from light industrial and commercial (including arts-related activities) to commercial only would not be considered a significant land use impact and are allowable by existing zoning, including the interim Industrial Protection Zones (IPZ). Demolition of industrial buildings resulting in displacement of businesses within the IPZ would require Conditional Use authorization from the Planning Commission.

Several existing offices were located on the project site at the time the building inventory was prepared for the EIR requirement. (See Response 10c – Business displacement for more discussion of the inventory.) On-site offices include those of computer design/consultants, multi-media uses, an architect, an urban designer, and film producer among others. Accessory offices for contractors and manufacturing facilities were correctly considered to be light industrial uses in the EIR.

¹ Pastron, Allen G., Ph.D., Archeo-Tec, “Archival Cultural Resources Evaluation of the Proposed Bryant Square Project, Located within the Block Bounded by Bryant, York, 19th and 20th Streets, City and County of San Francisco, California,” September 22, 1999.

² Hill, Ward, “Historic Architecture Evaluation Report for the Bryant Square Project in the City and County of San Francisco, California,” May 1999.

As noted on Pages 2-13 and 2-14, the project would be subject to regulations concerning the annual limit on office construction under *Planning Code* Sections 321 and 322. Exact determination of the amount of pre-existing office space for purposes of calculating the “additional office space” subject to the annual limit is a matter for determination by the Planning Department and the Zoning Administrator, and is not critical to the environmental effects of the proposed project.

The application for project authorization under Section 321 submitted by the project sponsor indicates a total of 7,032 gross square feet of preexisting office space to be retained and rehabilitated as part of the proposed project. The project sponsor states that it relies, for this purpose, on past determinations of the Zoning Administrator, made for the purpose of allocating the existing parking among the various uses on site, determining that a total of 5,860 occupied square feet of office uses (equivalent to 7,032 gross square feet of office space) is located in the existing building at 2101 Bryant Street. For purposes of evaluating potential environmental impacts, these were the assumptions used in this EIR.

Page 2-4 of the Draft EIR, Bullet A, the first sentence has been revised (additions are underlined):

“A. 2101 Bryant Street, an existing approximate 24,000 square-foot building on the corner of Bryant and 19th Streets would be seismically upgraded and renovated from light manufacturing, offices, and arts-related activities to offices.”

Page 2-7 of the Draft EIR, Table 1, under 2101 Bryant Street, “offices” are added as an existing land use.

M-1 (Light Industrial) and C-M (Heavy Commercial) zoning districts permit arts-related activities on the project site. These land uses are not permitted in residential zones (except for residential-commercial combined zones), including in the adjacent RH-2 (Residential, House: Two-Family) and RM-1 (Residential, Mixed: Low Density) districts.

Page 3-27 of the Draft EIR under site circulation, the following text was included:

“While traffic levels would increase with the new development, access would be focused on Bryant Street, which has mixed uses, including residential, rather than on quieter residential streets in the neighborhood . . .”

Thus this section of the Draft EIR did not describe Bryant Street as commercial, rather as one with mixed land uses.

Page 3-5 of the Draft EIR, land uses across Bryant Street are described as follows (revisions are underlined):

“West of the project block across Bryant Street are a mix of one- to three-story uses, including one restaurants ~~(one with a bar)~~, offices, and light industrial uses, and single- and multi-family residences.”

A site survey was conducted on February 8, 2000 which verified that one commenter was correct in stating that only one restaurant is located across Bryant Street.

The Draft EIR describes the project area as one with a mixture of land uses and does not state that the area is commercial. Pages 1 and 5 of the Draft EIR contain the only two general descriptions of land use in the area, and they respectively state:

“Land use in the project vicinity is primarily devoted to light industry, residential uses, neighborhood-serving retail uses, and offices.”

“A mix of mid- to low-rise residential, commercial, and light industrial uses generally surround the project site, including a number of nighttime uses.”

The M-1 (Light Industrial) District which covers the north approximate three-fourths of the project block allows commercial land uses as of right. (See *Planning Code* Section 219.)

(*Comment letters 1a, 2b, 2i, 2p, 9e, 13a, 14b, 30d, 31c, 31f, 31l, 45b, 51b, 52c, 56a, 58a, 58g; Public hearing comments 6, 57, 61, 64*)

5. Visual Quality and Shadows

Response 5a – Visual quality

As stated by Commissioner Mills at the public hearing on the Draft EIR:

“ . . . I would make a point of clarification that I hope I’m right about, but often these photographs that are in the EIRs are not the actual project design. They are just a placeholder. . . It represents the potential bulk that it could get, but it does not necessarily represent the design represented by the project sponsor.”

Since the public hearing, the project design has been further developed, and the current proposal is described as the Increased Parking Variant to the Parking-Demand Compliant Alternative. A photomontage has been prepared for the project as now proposed and is contained in Section 5.2 Addenda to the Draft EIR as an addition to Section 6.5.

The EIR significance criterion relevant to visual quality is if a project were to “have a substantial, demonstrable negative aesthetic effect.”

Visual quality is by nature subjective. Value judgments about aesthetics are inappropriate in an EIR. No consensus definition of terms such as “visual character” or “aesthetics” exists. Generally a significant visual effect could be found by developing an open area or by obstructing scenic vistas from public areas. A dislike of a building design is not enough in itself to cause a significant physical environmental impact. Because of the aforementioned reasons, visual quality was determined by the Initial Study to not result in a significant impact on the environment. Refer to Response 5d – Building size for a discussion of impacts related to the project scale.

The project as currently proposed (with a more developed project design, unlike the massing model contained within the Draft EIR) would be of a different visual character than is currently on site. However, the site would continue to appear to be of a commercial/industrial nature, as have other buildings that have been on the project site for more than 100 years. The building would be a new large structure within the neighborhood, but would not substantially change the visual character of the neighborhood or result in a demonstrable significant visual quality effect.

(Comment letters 3a, 3d, 50, 6f, 9b, 12a, 18b, 20a, 21a, 22d, 23c, 25b, 27a, 28b, 30b, 30i, 34b, 34i, 34k, 36c, 46a, 47a, 48c, 49a, 50b, 53c, 56a, 57a, 58e, 58h; Public hearing comments 10, 15, 16, 20, 22, 23, 31, 32, 39, 40, 51, 55, 72)

Response 5b – Visual simulations

Figure 13 on page 3-13 of the Draft EIR shows the loss of view of the sign on the side of the 720 York Street building. Adding an additional photomontage of this same building face from a different angle would not add to an understanding of the size, scale, and character of the proposed project in its context, and would not disclose additional potential significant environmental impacts. See also Response 6b – The Mill Building (720 York Street) for a discussion of the historic significance of this building.

The greater the distance from a project site, the smaller a proposed project would appear. Contrary to statements by one commenter, the proposed project would appear relatively small from Cesar Chavez Street. The project sponsor had originally requested that photomontages from a distance be added to the Draft EIR, but because no additional information or impacts would be disclosed, these were ultimately not included in the document.

(Comment letters 9b, 34j)

Response 5c – Views

The scope of analysis of view impacts under *CEQA* focuses on scenic views from public areas rather than from private properties. The significance criterion from the EIR relevant to views would be if a project were to “substantially degrade or obstruct a scenic view or vista from a public area.” Some private views, including views from nearby residences, would be blocked by the proposed project.

Public view corridors down the streets (*i.e.*, Bryant, 19th, and 20th Streets) would continue to be open because project buildings would not extend into the streets. One commenter noted that the project would block views looking north on Bryant Street because the project site jogs into the roadway. However, this is a current condition and views looking north along Bryant Street see

buildings that currently exist on the project site. These views of existing buildings are not scenic views. With the project, this view would now be dominated by a view of the proposed project.

Besides the accurate photographs shown within the Draft EIR in Figures 11 to 13, pages 3-11 to 3-13, the project files contain several photographs of the area that were submitted with the application for environmental review. These photographs are part of the administrative record and are available for review by the Planning Commissioners and public. The Planning Commission makes its determination on the adequacy of an EIR based on the whole record available. Refer to Response 3a – EIR adequacy for additional discussion of this matter. To add additional photographs would not further add information about potentially significant impacts that have not already been disclosed.

(Comment letters 2d, 2p, 20b, 22c, 23a, 25b, 29b, 30c, 31e, 34j, 50c, 51c, 53a, 57a, 58a, 58c)

Response 5d – Building size

The significance criterion from the EIR (Draft EIR, page 3-8) relevant to building size states that the building: “be substantially incompatible with the surrounding environment by introducing structures of substantially greater size, mass, and scale into the area.”

Although this building is greater in size and scale than surrounding residential structures, the project is of a similar size and scale as industrial and commercial buildings about three blocks north on Bryant Street, also within the same IPZ zone as the project, and the project would be substantially smaller than San Francisco General Hospital about three blocks southeast of the project site. In addition, the adjacent 2101 Bryant Street building would appear to be a similar scale as the proposed new building at 2125 Bryant Street as can be seen in the visual simulations in Figures 11 and 12, page 3-11 and 3-12, respectively of the Draft EIR

Although the EIR does not find building scale to be a significant environmental impact, the Planning Commission could determine that the scale of the project is too large for the area during deliberations on project approval. Refer to Response 2a – Project approval process, above.

Note that since publication of the Draft EIR, the project sponsor has redesigned the project to reduce its scale, in particular at the corner of Bryant and 19th Streets. Changes to the building

design are described in Section 5.2 Addenda to the Draft EIR of this document, as the Increased Parking Variant to the Parking-Demand Compliant Alternative.

(Comment letters 1a, 1b, 2c, 2p, 3a, 5a, 14b, 16d, 18d, 20a, 21a, 23a, 25a, 28a, 30i, 32a, 34b, 34i, 34m, 36b, 44b, 45c, 46a, 47a, 51c, 53c 54a, 56a, 58e; Public hearing comments 10, 11, 26, 28, 43, 46)

Response 5e – Shadows

Shadow studies have been prepared for the project as currently proposed (the Increased Parking Variant to the Parking-Demand Compliant Alternative) and are available for review in the project files at the Planning Department under Case File No. 98.635E. Shadow patterns for existing buildings and for the project have been prepared for 10:00 a.m., noon, and 3:00 p.m. during the winter and summer solstices, when the sun is at its lowest and highest, and during the spring and fall equinoxes, when the sun is at its midpoint.

At 10:00 a.m. Pacific Standard Time (pst) and 3:00 p.m. on December 21 shadow from the proposed project would extend across 19th Street, and would shade a portion of the front of industrial buildings north of the project. At noon, new shadow would extend into the street. During the remainder of the year, the shadow would extend across sidewalks adjacent to the project and into the street during the day from 10:00 a.m. to 3:00 p.m. In addition, the project would not shade any public open space.

The net new shading of adjacent properties and residential uses which would result from constructing the proposed new buildings would be limited in extent, and would not increase the total amount of shading in the neighborhood above levels which are common and generally accepted in urban areas. The new structures would shade adjacent properties but not to an extent considered to be a significant adverse impact on the City's environment.

Regarding the project's interior open space, new shadow would extend across a portion of the area, leaving much of the interior plaza in sunlight during all seasons of the year.

Also, as noted on page 22 of the Initial Study (Draft EIR, Appendix A):

“These new buildings would not be of sufficient scale to alter pedestrian-level wind conditions in the vicinity. No adverse wind effects would be expected to result from the project.”

This EIR acknowledges the commenters’ concerns about increased wind conditions in the project vicinity. Large structures can affect street level wind conditions. Such effects can occur when a new large building mass extends substantially above its neighbors, or contributes to the creation of a large wall facing into prevailing winds. Such potential impacts can be reduced or avoided by building articulation, such that winds are not diverted to the street by a large, flat building surface. Typically, in San Francisco a wind study is not considered necessary unless the building would be at least 80 feet tall, and present a large solid building mass, substantially above its neighbors, into a prevailing wind. That is not the case with the proposed building at the corner of Bryant and 19th Streets.

Prevailing winds in the City are from the north and northwest. The addition to the 2101 Bryant Street building would step back from both the north and northwest faces of the existing building. The proposed new building at 2125 Bryant Street would step up from the adjacent 2101 Bryant Street building, adding further articulation from the north. In addition, at a maximum height of 65 feet for the 2125 Bryant Street building, the proposed project would not result in a large building wall mass which extended substantially above neighboring buildings. Hence, the Initial Study concluded that the proposed project was not expected to result in adverse wind effects.

(Comment letters 1a, 5c, 5o, 9i, 16c, 18d, 20b, 22c, 24b, 25b, 29b, 44c, 45c, 50c, 57a, 58a, 58c; Public hearing comments 31, 34, 42, 51, 55, 73)

6. Historic Structures

Response 6a – 2101 Bryant Street

The project is not located in a recognized historic district. As noted in the Draft EIR, no historic structures would be demolished as part of the project. The Building at 2101 Bryant Street is potentially eligible for the National Register of Historic Places and the California Register of Historic Resources because of its association with the Remler Company, which occupied the building as its company headquarters for over 40 years, and because it is an excellent example of

industrial architecture from its period and a fine industrial design. The project sponsor proposes to rehabilitate the 2101 Bryant Street building in accordance with the Secretary of Interior's Standards for Rehabilitation.

The proposed new structure at 2125 Bryant Street and the addition to the historic building at 2101 Bryant Street were evaluated for conformance with the ten Standards outlined in The Secretary of Interior's Standards for Rehabilitation.³ Some of the conclusions of that analysis are restated herein.

Although the 2125 Bryant Street building would not include rehabilitation of a historic structure, Standard 3 is relevant to new construction near a historic building. This standard states:

“Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.”

The project does not attempt to use architectural elements from other buildings or create a false sense of historical development inconsistent with the new development of the proposed building. Use of brick to blend in with existing historic buildings on the project block could create a false sense of historical development, in contravention to Standard 3 of the Secretary of Interior Standards. The project should be of materials of its own present time and of its proposed office use to meet the standards.

Standard 9 is also applicable to new construction:

“New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.”

The new office building at 2125 Bryant Street would cover the 2101 Bryant Street building's south façade, which is currently visible. The south façade, however, is not a significant

³ Hill, Ward, “Historic Architecture Evaluation Report for the Bryant Square Project in the City and County of San Francisco, California,” May 1999.

character-defining feature; consequently blocking the view of this side of the building would not violate the Secretary of Interior Standards.

Regarding the renovation of and new addition to the top of the 2101 Bryant Street building, the project would cause minimal changes to the defining characteristics of the building and would not alter or remove historic features of the building or alter distinctive features that characterize the building. The fourth floor addition to 2101 Bryant Street would not radically change, destroy or obscure character-defining features of the historic building. Set back from the cornice line, the new addition would be compatible with the scale and form of the building. The glazed exterior walls would make the fourth floor distinct from the historic building and less conspicuous from the exterior. Because of setbacks, the addition would not generally be noticeable from the main Bryant Street frontage.

The addition to the 2101 Bryant Street building would not be generally visible from Bryant Street except in the area close to the intersection with 19th Street. The addition would be more visible from 19th Street. Visibility of a portion of the addition above the existing parapet would not in itself be a significant effect. The addition is intended to be in conformance with Secretary of Interior Standards, and the Planning Department has concluded that any visible changes in context with the historic building would not be significant. As noted above, the addition is purposefully of a different architectural style and is designed with different materials so as to not create a false sense of historical development.

In addition, as stated in the Historic Architecture Evaluation Report, “If the fourth floor addition proposed in the project was removed in the future, the essential form and integrity of 2101 Bryant Street would not be impaired. Therefore, the project is consistent with Standard 10.”

The Historic Architecture Evaluation Report for the building looked at an iteration of the project that contained more detail about fenestration than was contained in the massing model shown in the Draft EIR. Subsequent to publication of the Draft EIR, the project has been changed and is now a variant to the Parking-Demand Compliant Alternative. This may be seen in Section 5.2 Addenda to the Draft EIR of this document, as changes to Section 6.5 of the Draft EIR.

As stated on page 3-17 of the Draft EIR: “because the project sponsor has agreed to ensure that alterations to the 2101 Bryant Street building are consistent with the Secretary of the Interior’s

Standards, the proposed project would not have significant effect on historic architectural resources.”

(Comment letters 9c, 12a, 16d, 26a, 30g, 34k, 51e, 58g)

Response 6b – The Mill Building (720 York Street)

The Golden Gate Woolen Mill building at 720 York Street was constructed in 1879. The building is a modest one, architecturally distinctive primarily for its simplicity and integrity. The building is part of a pattern of development that extended the south of Market Street industrial area along the Southern Pacific railroad tracks to 20th Street. South of 20th Street the area is primarily residential. Its architectural associations are notable, however, as the product of one of the premier architectural firms of the period. The building was never the site of any known important historical event. Although the area has been often surveyed, and a few well-known historic resources have been identified nearby, this building has never been acknowledged for its architectural, historic, or contextual qualities.⁴

The project is not listed as an important historical resource by the City and County of San Francisco and has not been acknowledged as potentially eligible for the National Register of Historic Places. Although the building is considered to be historic because it is more than 50 years old, impacts to it would not fit the level of significance criteria for impacts on significant historic resources. Thus the Draft EIR did not assess potential impacts to historic resources of the Mill Building. As the Mill Building at 720 York Street is not a significant historic resource, construction of a new building that blocks views of the painted sign on the side of this building would not be significant.

For a discussion as to why the proposed building at 2125 Bryant Street should not be constructed of brick, refer to Response 6a – 2101 Bryant Street.

Because some people are concerned that impacts to 720 York Street would be significant does not mean that impacts should be considered significant under *CEQA*. The *CEQA Statute* must be used to determine the historic significance of buildings, and then an analysis of the impacts of any proposed change upon the character defining patterns of an historic resource must be

performed to determine whether a project's impacts are significant. Refer also to Response 3a – EIR adequacy for additional discussion.

(Comment letters 9a, 9b, 12a, 25b, 34n, 34o, 48c, 58f; Public hearing comment 41)

7. Transportation

Response 7a – Parking demand/Supply

As summarized on Table 6, page 3-30 of the Draft EIR, the Bryant Square Project would generate a *Planning Code* requirement of 272 spaces. This is based on the office, retail, and industrial uses proposed to occupy the site and accounts for the retention or reuse of some of the existing historic buildings. The parking demand for the Bryant Square project was calculated to be 309 spaces: 213 long-term and 96 short-term spaces.

The Bryant Square project would provide 203 independently accessible parking spaces in a two-story underground parking garage. The parking supply would be increased to 301 spaces through the use of valet parking services within the garage.

As summarized in Table 7 and on pages 3-32 and 3-33 of the Draft EIR, the underground parking garage for Bryant Square must accommodate the parking for the Bryant Square Project and the previously approved 720 York Project. The most recent Notice of Special Restriction (1999G618143) for this block requires a set aside of 16 parking spaces for the York Street Project. Accounting for the allocation of 16 parking spaces for the 720 York Street Project in the garage, the number of independently accessible parking spaces available for the Bryant Square Project is reduced to 187 spaces or 285 spaces through valet parking operations. If 45 spaces are reserved on the site for the 720 York Street project, as proposed by the project sponsor, the parking spaces available for the proposed Bryant Square Project would be reduced to 158 spaces or 256 spaces with valet parking operations.

As shown on Table 7 of the Draft EIR, the parking shortfall for the Bryant Square project would be 114 spaces when compared to the number of independently accessible parking spaces provided, if 45 spaces were allocated to the 720 York Street project. When expanded through

⁴ McGrew, Patrick, "The Golden Gate Woolen Mill, Abbreviated Historic Structure Report," November 20, 1998.

valet operations, the project would have a surplus of 13 spaces, if 16 spaces were allocated to the 720 York Street Project, or a shortfall of 16 spaces, if 45 spaces were allocated to the 720 York Street Project.

Table C&R.1 Parking Code Requirements and Demand, below, compares *Planning Code* requirements and parking demand for the project as originally proposed, for the Parking Demand Compliant Alternative, for the Increased Parking Variant to that alternative, and for the All Industrial Alternative.

See Response 2b – Parking variance for a discussion of the approval action necessary to accommodate valet parking operations.

The Parking-Demand Compliant Alternative as originally described on page 6-7 of the Draft EIR, and as amended with the addition of an Increased Parking Variant in this Comments and Responses document, would mitigate the parking shortfall associated with the proposed project. The Increased Parking Variant to the Parking-Demand Compliant Alternative would have a parking code requirement of 260 spaces and a parking demand of 235 spaces. With an additional underground parking level, the parking garage would provide 260 independently accessible parking spaces. The parking supply would be increased to a total of 339 parking spaces through valet-assisted operations.

When comparing the amount of parking required for the combined Bryant Square alternative and 720 York Street development to the independently-accessible spaces provided by the Increased Parking Variant to the Parking-Demand Compliant Alternative, the parking shortfall is 16 spaces, if 16 parking spaces are allocated to the 720 York Street project, and would result in a parking shortfall of 45 spaces, if 45 spaces are allocated to 720 York Street. When the total parking supply of 366 spaces, as expanded through valet operations, is compared to the parking requirements, an excess of 61 to 91 parking spaces would be provided depending upon the allocation of spaces to the 720 York Street project. See Table C&R.2: Parking Supply Surplus/Shortfall for the Increased Parking Variant, below, for a comparison of parking requirements, parking supply, and parking demand.

As the Increased Parking Variant to the Parking-Demand Compliant Alternative would meet parking requirements for the project only through the use of valet parking operations, an exception

Table C&R.1 Parking Code Requirements and Demand									
Gross sq. ft.			Occupied sq. ft.	Parking rate	Code Requirement	Allowable Deficit	Adjusted Code Requirement	Long-Term	Parking Demand Short-Term Total
Original Project									
Office	152,590	129,702	500 sq. ft.	260	5	255	188	28	216
Retail	9,550	8,118	500 sq. ft.	16	0	16	21	67	88
Industrial	4,675	3,974	1,500 sq. ft.	2	1	1	4	1	5
Total	166,815			278	6	272	213	96	309
Parking-Demand Compliant Alternative									
Office	146,050	124,143	500 sq. ft.	248	5	243	176	27	203
Retail	5,000	4,250	500 sq. ft.	9	0	9	11	35	46
Industrial	4,675	3,974	1,500 sq. ft.	2	1	1	4	1	5
Total	155,725			259	6	253	191	63	254
Increased Parking Variant (to the Parking-Demand Compliant Alternative)									
Office	152,840	129,914	500 sq. ft.	260	5	255	189	28	217
Retail	1,500	1,275	500 sq. ft.	3	0	3	3	10	13
Industrial	4,675	3,974	1,500 sq. ft.	3	1	2	4	1	5
Total	159,015			266	6	260	196	39	235
All Industrial Alternative									
Office	0	0	500 sq. ft.	0	5	0	0	0	0
Retail	0	0	500 sq. ft.	0	0	0	0	0	0
Industrial	156,675	134,074	1,500 sq. ft.	89	1	88	138	17	155
Total	156,675			89	6	83	138	17	155

Source: The Duffey Company, 2000; Maxwell & Associates, 2000.

Table C&R.2: Parking Supply Surplus/Shortfall					
Increased Parking Variant	Parking Supply	Code Requirement	Code to Supply Surplus/Shortfall	Parking Demand	Demand to Supply Surplus/Shortfall
Valet spaces – 16 for 720 York St.	350 ^a	260	+90	235	+115
Independently accessible spaces	244 ^a	260	-16	235	+9
Valet spaces – 45 for 720 York St.	321 ^b	260	+61	235	+86
Independently accessible spaces	215 ^b	260	-45	235	-20
<p>^a Sixteen parking spaces have been deleted from the parking supply total to take into account the 16-space parking requirement for the 720 York parcel based on NSR (1999G618143).</p> <p>^b Subsequent to approval of the 720 York Street project, the Planning Commission adopted a policy requiring one parking space per live/work unit. To meet this requirement, 720 York Street would need to provide 29 additional parking spaces for the 35 live/work and 10 work only units. Bryant Square has proposed to provide 29 valet parking spaces in addition to the 16 spaces required for the 720 York Street units. Thus 45 spaces have been deleted from the parking supply for this scenario.</p> <p>Source: The Duffey Company, 2000; Maxwell & Associates, 2000.</p>					

through the PUD process or a parking variance would still be required for this variant as outlined above.

(Comment Letters 1b, 2f, 5g, 5l, 6a, 7a, 16e, 22b, 23b, 29a, 32b, 34q, 36a, 48b, 53b, 54a, 55a)

Response 7b – Parking meters

As stated on page 3-34 of the Draft EIR, with the increasing competition for on-street parking the introduction of parking meters may be warranted on curbs bordering the project only. Inclusion of parking meters is not a mitigation measure to reduce potentially significant effects.

However, decision makers could decide to include parking meters as a condition of project approval. Bryant Street, 19th Street, and 20th Street, which would all have commercial frontage, were identified as street frontages that may warrant parking meters. The Draft EIR did not suggest establishing parking meters along residential frontages and it would be contrary to city policy to do so. The installation of meters would need to be coordinated through the Department of Parking and Traffic and would be implemented if warranted upon completion of the project. A public hearing would be required prior to the institution of new meters.

Installation of parking meters would increase the parking turnover in the area, and preserve on-street parking for visitors to the neighborhood. As parking meters would be in effect during weekdays and Saturday, the spaces would be available for long-term parking by residents after 6:00 p.m. each day and all day on Sunday. San Francisco does not have a program that permits exemptions to parking meter restrictions for residents living near a commercial street.

(Comment letters 2e, 2m, 34q, 48b, 58d)

Response 7c – Parking congestion

As stated in the Draft EIR on pages 3-33 and 3-34, the parking shortfalls associated with the project would increase the competition for on-street parking that is already at or near capacity. The parking occupancy in the immediate project area already averages 100 percent of occupancy with cars observed to be double-parked and illegally parked, blocking driveways. The construction activity occurring on York Street when the counts were taken, may have compounded the conditions, but are similar to conditions that might occur during construction of the Bryant Square project. When parking reaches capacity as in this neighborhood, localized traffic may increase as cars circle the blocks in search of parking, and illegal parking activity is compounded. The Draft EIR statements are consistent with the comments on this topic.

As stated on page 3-31 of the Draft EIR, there would be no net loss of on-street parking associated with the implementation of the Bryant Square project. One on-street parking space on

Bryant Street would be lost at the proposed driveway location, but two on-street parking spaces would be gained on 20th Street where existing driveways would be eliminated.

The parking impacts associated with the project and documented in the Draft EIR are not identified as significant. First, a shortfall of parking relative to demand is, at most, an inconvenience for persons choosing to own and operate vehicles in the City. Accommodating an unconstrained demand for vehicles by requiring parking to meet demand would encourage additional vehicle use, with associated environmental problems of traffic congestion, safety, air pollution, and noise. It is for these reasons that the City has adopted and repeatedly endorsed a “Transit First” policy (in the Transportation Element of the *San Francisco General Plan*) that prioritizes accommodating transit service over private vehicles.

Second, while a parking shortfall is a reality in many areas of San Francisco, the issue of parking space supply versus demand and occupancy is not considered by the City to be a permanent physical environmental condition. Parking occupancy varies throughout the day, from day to day, and from month to month. It is not a static physical environmental condition in the same way as a building which, once constructed, remains as is and physically remains in the environment in a predictable way for an extended time.

Third, the habits of people who drive change when they are faced with a parking shortage. People may park further from a site, choose to arrive at different times, carpool, or switch to another travel mode (e.g., public transit, taxi, bicycle, or foot) to adjust to changed parking conditions.

Finally, San Francisco has a relatively high degree of transit service, so that there is a true option to driving for many people. In support of San Francisco’s “Transit First” policy, which emphasizes a shift from use of the personal automobile to use of public transit, priority is given to transit improvements before developing transportation treatments which encourage the continued use of the personal automobile, such as parking.

Implementation of the Increased Parking Variant to the Parking-Demand Compliant Alternative, as currently proposed by the project sponsor, would eliminate the *Planning Code*-required parking shortfall associated with the project, by downsizing the development and adding a third parking level to the garage. This alternative would still require a parking variance or an exception through the PUD process as some or all of the *Planning Code*-required parking would be provided through valet-assisted parking spaces.

(Comment letters 2f, 2p, 5g, 5l, 5v, 5w, 9j, 12b, 13b, 14a, 14c, 16b, 17a, 20c, 21b, 22d, 25c, 28c, 30a, 31b, 37a, 37b, 38a, 38b, 39a, 39b, 40a, 40b, 41a, 41b, 42a, 42b, 43a, 43b, 44b, 45d, 48b, 48j, 50c, 52b, 58d; Public hearing comments 4, 5, 7, 14, 19, 22, 29, 37, 45, 49, 51)

Response 7d – Parking ingress/egress

Parking ingress and egress is discussed on pages 3-31 and 3-32 of the Draft EIR. The two-way driveway to the parking garage would be designed with the entry equipment at the foot of the garage ramp allowing queuing of three vehicles on the ramp itself. An additional 10 to 12 cars could be accommodated in the valet-staging area on the first level of the parking garage. This design responds to the Department of Parking and Traffic requirement that adequate on-site queuing space be provided to avoid disruption of traffic on the streets serving the parking facility.

(Comment letter 48j)

Response 7e – Visitor and delivery parking

The parking demand calculated for the project and summarized in Table 6 on page 3-30 of the Draft EIR, accounts for all vehicles trips, including employee and visitor trips to the site. The calculation of the long-term parking demand is based on the estimated work-related or employee trips to the site. Short-term parking demand is estimated from the non-work or visitor trips to the

site. A more detailed explanation of the parking calculations is provided in the *Bryant Square Project Final Transportation Impact Report*.⁵

The deliveries to the site would be accommodated at an off-street surface loading dock accessed from 19th Street. The description of freight loading for the site is discussed on pages 3-35 and 3-36 of the Draft EIR.

(Comment letters 2g, 52b)

Response 7f – Parking counts

The Planning Department generally requires that base data be no more than two years old when used in the assessment of transportation impacts for an EIR. The parking inventory and occupancy counts were conducted in October 1998 as indicated on page 3-32 of the Draft EIR. At the time that counts were conducted, the on-street parking spaces averaged 100 percent occupancy. Double-parked cars, cars blocking driveways, trucks loading and unloading in the street, and cars parked on the sidewalks were all observed in the neighborhood. An update of the traffic report in September 1999, confirmed that these conditions still existed.

With the parking already at 100 percent occupancy, the increased competition for on-street parking can manifest itself as increased occurrences of traffic circling the blocks in search of parking, increasing incidence of illegally parked cars, and increased aggressiveness of drivers in securing the parking spaces that do open up. In addition, some drivers may shift to transit or find alternative parking facilities farther from their destination. All of these observations were made in comments to the Draft EIR and are noted.

(Comment letter 48g)

⁵ The Duffey Company, *Bryant Square Project Final Transportation Impact Report*, September 9, 1999.

Response 7g – Disabled parking

The project would provide twelve handicapped parking stalls on-site within the garage for the use of employees, residents, and visitors to the site as required by code. The project would not affect any on-street designated disabled parking spaces. The Department of Parking and Traffic is responsible for designating such spaces on-street. If determined appropriate by the Department of Parking and Traffic, a handicapped parking space could be designated along the project frontage.

(Public hearing comment 17)

Response 7h – Traffic counts

The transportation work scope for Bryant Square was developed based on direction from the Planning Department. The intersection of Bryant and 17th Streets was not included as it was not identified as a critical intersection. The intersection of 16th and Bryant Streets experiences the heaviest volumes of traffic and the greatest delays in this section of Bryant Street. The Bryant Square project would contribute about 15 percent of the cumulative growth at this intersection and it would continue to operate at a level of service B.

The Planning Department generally requires that base data be no more than two years old when used in the assessment of transportation impacts for an EIR. The traffic counts were conducted in January and October 1998 as indicated on page 3-20 of the Draft EIR and fall within the acceptable range. If the traffic has increased based on development in the area, then these increases would be reflected in the Cumulative 2010 as analyzed in the Draft EIR. As noted in Table 5 on page 3-28 of the Draft EIR, all study area intersections except two would operate at LOS A or B even with the expected growth in the area. The intersection of Bryant Street and Cesar Chavez Street would operate at LOS C and the 23rd Street and Potrero Avenue intersection would operate at LOS F as it does today.

At the 23rd Street and Potrero Avenue intersection, the increase in traffic delays would result in significant cumulative traffic impacts. The Bryant Square contribution of 10 percent of total traffic growth would be contributory to the significant impacts (an increase of about 53 seconds of average delay) at this intersection. Mitigation Measure F.1, modification of signal timing, page 4-5, would reduce this impact to a less-than-significant level (*i.e.*, to approximately what currently exists at the intersection).

(Comment letters 48d, 51g)

Response 7i – Traffic methodology

The methodology for determining the level of service at an intersection is based on the 1994 *Highway Capacity Manual* published by the Transportation Research Board. The level of service is expressed as a letter value based on the average delays experienced by motorists at an intersection. This methodology is consistently used for project assessment by the City of San Francisco, as prescribed by the *Guidelines for Environmental Review*.⁶

It is neither feasible nor meaningful to assess the delay for each vehicle approaching the intersection. The variation in delays experienced at an intersection depends on a number of variables including traffic progression, the length of the signal cycle, the amount of green time, and the number of vehicles relative to capacity available. Vehicles in the regular traffic flow, regulated by a signal, will experience similar delays rather than widely variant delays for each individual vehicle as suggested by the commenter.

(Comment letter 34r)

Response 7j – Project trip generation

The 8.5 percent is a standard p.m. peak hour trip rate for office uses as specified in the Planning Department *Guidelines for Environmental Review, Transportation Impacts*. The commenter is

⁶ San Francisco Planning Department, *Guidelines for Environmental Review: Transportation Impacts*, July 1991.

correct in noting the percentage increase in daily trips generated from the project. The transportation impacts on the project study area have been documented in the Draft EIR on pages 3-25 through 3-27. A cumulative significant impact was identified at the 23rd and Potrero Avenue intersection in association with the increased delays and a mitigation measure of signal timing was identified. While the traffic and the parking conflicts in the neighborhood would increase with the implementation of the project, the associated impacts are not identified as significant, given the San Francisco significance criteria (see page 3-24 of the Draft EIR).

(Comment letters 2h, 45d, 51f)

Response 7k – Transportation mode split

The transportation analysis conducted for the project assumed that 68 percent of the employees at the project site would arrive by auto and 18 percent would use public transportation during the p.m. peak hour. This is based on the Planning Department's *Citywide Travel Behavior Survey* conducted in 1993 and reflects averages for businesses in the southeast sector of San Francisco. It takes into account the relatively poor level of transit accessibility in the area and is a considerably higher drive alone rate than occurs in the downtown or northeast sectors of the City.

(Comment letter 6c)

Response 7l – Intersection conditions

With a mitigation measure included in the Draft EIR, no significant traffic impacts were identified for the project. The project has been assessed against the significance criteria established by the Planning Department. As noted on page 3-24 of the Draft EIR, a project is typically considered to have a significant effect on the environment if it would:

“cause traffic at an intersection to deteriorate to an unacceptable level (from LOS D or better to LOS E or LOS F); interfere with existing transportation systems causing substantial alteration to circulation patterns or causing major traffic hazards; or contribute

considerably to cumulative traffic increases at intersections that would result in deterioration of traffic conditions to unacceptable levels.”

The intersection level of service takes into account the amount of traffic that can be accommodated at a given intersection during its peak use period (usually in 15-minute increments) and estimates the average delays experienced by cars traveling through the intersection. Residents along local streets in moderate- to low-density residential areas may be more sensitive to the affects of increased traffic volumes when the current traffic volumes on their streets are relatively low. The introduction of larger commercial uses may not substantially degrade the levels of service at an intersection, but the increased local traffic can affect the perception of neighborhood character.

(Comment letters 2e, 2g, 31j, 48e, 48f, 48i)

Response 7m – Traffic congestion

The traffic counts conducted on 19th and 20th Streets, as detailed in the Transportation Impact Report, show moderate volumes of traffic on these two streets during the afternoon p.m. peak hour. During the p.m. peak hour 19th Street carries about 160 to 180 two-way trips and 20th Street carries about 240 to 250 two-way trips, east of Bryant Street. York Street carries about 60 to 70 two-way vehicle trips between 19th and 20th Streets during the p.m. peak hour. Traffic on 19th and 20th streets is expected to increase by a total of about 35 trips during the p.m. peak hour as project traffic travels to Potrero Avenue to access the freeway. York Street would not experience noticeable traffic increases with the project as the counts were taken during periods of relatively high activity on York Street.

In contrast, Potrero Avenue, at 23rd Street, carries nearly 2,500 two-way trips and Bryant Street, in the vicinity of the project, carries about 650 two-way trips in the p.m. peak hour. Congestion is encountered at the intersection of 23rd Street and Potrero Avenue and may queue back for a block or two, but the intersections on Bryant Street do not currently experience such queues. With background growth accounted for in 2010, the intersections along Bryant Street are projected to continue to operate at acceptable levels of service. The congestion projected at the 23rd Avenue and Potrero Avenue intersection in the future could result in increased delays if the

identified mitigation measure to adjust the signal timing is not put in place. This could result in traffic diversion on to neighborhood streets.

(Comment letters 2p, 3c, 6d, 16b, 30f, 31j, 34p, 45d, 48i, 54a, 58g; Public hearing comment 33)

Response 7n – Garage entrance impacts

The Draft EIR assumed the driveway for the garage would be located on Bryant Street and the travel patterns analyzed in the intersection level of service assessment were based on this access pattern. As stated in the Draft EIR on page 3-27, Bryant Street will experience increased traffic levels. Locating the project access on Bryant Street, which has mixed uses, including residential and commercial, would focus traffic increases on the busier street, rather than on the quieter residential streets. The ticket-spitter for the garage would be located at the foot of the garage ramp to accommodate onsite queuing of vehicles which would minimize disruption to traffic on Bryant Street.

(Comment letter 2j)

Response 7o – Transit commute

It is estimated that about 18 percent of the Bryant Square person trips during the p.m. peak hour would be via public transit and about 68 percent via automobile. With the projected shortfall in parking relative to parking demand at the project site, the competition for on-street parking would increase. This could lead to shifting of travel modes for employees or residents as the ownership of a car and travel by car becomes less convenient.

(Comment letter 2g)

Response 7p – Transit service

Seven transit lines serve the neighborhood as described in the Bryant Square Transportation Impact Report, page 13. The 27-Bryant bus operates on Bryant Street with 15-minute headways. The inbound buses operate at 83 percent of capacity and the outbound buses operate at 64

percent of capacity during the p.m. peak hour. The 9–San Bruno bus line, which operates on Potrero Avenue with 10-minute headways and the 12–Folsom bus line, which operates on Folsom Street with 20-minute headways also provide downtown service within walking distance of the project site. The 22–Fillmore, 33–Stanyan, and 48–Quintara/24th all provide crosstown bus service and the 53–Southern Heights provides local community transit service. The p.m. peak hour capacity utilization on these lines ranges from 28 percent to 84 percent. All but two of these bus lines are classified as policy lines, *i.e.*, operating at a peak period headway greater than 10 minutes. Viable downtown-oriented service is available only on the 9–San Bruno bus line and viable crosstown-oriented service is available on the 22–Fillmore bus line, which is located a distance from the project site. There would be adequate capacity to accommodate the additional transit trips generated by the Bryant Square Project.

The structure and frequency of service to the Mission District would be affected by the current planning efforts underway to improve transit service in the South of Market area. As part of that study, improved service is being proposed in two phases for the 12–Folsom line. During the first phase, the hours of operation for the line would be extended from 6:00 a.m. to 12 midnight for weekdays and weekends and during the second phase the frequency of service would change from 20-minute to 15-minute headways. A new route resulting from the breakout of service on the #42 line is also under consideration. One proposal would run a new eastside loop for the #42 to Showplace Square and out 16th Street to the BART station. These service proposals have been the subject of three community meetings. Muni is in the process of developing a staff recommendation and a public hearing will be held at the Public Transportation Commission within the next several months.

Muni has received other requests to revamp service on the 27–Bryant bus line and to expand service on the 9–San Bruno line out to San Francisco General Hospital. These requests are under consideration, but are not part of a specific proposal at this point. There are no plans for electrification of the 27–Bryant line in the Muni Short-Range Transit Plan.

The systemwide reliability of Muni is not specifically addressed in this EIR and is not related to this individual project.

(Comment letters 6c, 9g, 30e, 31k, 34s; Public hearing comments 12, 18)

Response 7q – “Transit First” policy

The project is designed to accommodate different modes of travel to the site. The majority of employees and visitors to the site are expected to travel by private auto. On-site parking will permit this option. The transit shelter currently located on Bryant Street at 19th Street would need to be temporarily relocated during construction. Upon completion of construction, the project sponsor would be required to return the transit shelter and bus stop to its original location. A standard Muni transit shelter would be appropriate at this location. Because the Draft EIR determined that the project would result in no significant transit impacts, no mitigation measures are warranted. (See Response 7c – Parking congestion, above, for additional discussion of the “Transit First” policy.)

The project sponsor, as part of its Increased Parking Variant to the Parking-Demand Compliant Alternative, plans to include lighting and planting and new curb ramps along Bryant Street to enhance the pedestrian experience and make use of public transit more conducive.

(Comment letters 10b, 49b; Public hearing comment 1)

Response 7r – Pedestrian analysis

The amount of foot traffic in the neighborhood would increase with an intensification of the type of land uses in the area. Field observations and pedestrian counts conducted at the project site, as noted on page 3-35 of the Draft EIR, indicate that pedestrian travel on the sidewalks is not congested nor would congested conditions occur with project approval. A worst-case analysis was conducted at the six-foot wide sidewalk segment on Bryant Street. Even if all the project pedestrian trips traveled past this segment during the p.m. peak hour, the sidewalk would continue to operate at LOS A and would remain unrestricted.

(Comment letters 10b, 10c, 16b, 30f, 49e; Public hearing comment 3)

Response 7s – Freight loading

As noted on page 3-35 of the Draft EIR, the Bryant Square project would generate about 35 daily service vehicle trips. The freight loading demand during an average hour would be 1.56 loading

spaces and the demand during a peak hour would be 1.94 spaces. The project would provide one loading space located off of 19th Street as required by code. The driveway serving the loading space is over 90 feet long and 34 feet wide. It could accommodate an additional service vehicle during peak use periods. The driveway area is also considered a pedestrian alley.

The loading space would require on-street maneuvering for service vehicles either backing in or out from 19th Street. This would periodically disrupt traffic and pedestrian flows on 19th Street. However, 19th Street carries relatively low traffic volumes and the intermittent disruption would not be expected to create congestion that would extend to the intersections at Bryant Street or York Street. Pedestrians along the west side of 19th Street would periodically have to stop as service vehicles enter or leave the site. This would be similar to any driveway condition. The on-site loading driveway is a shared use with pedestrians. The following improvement measure, as identified in the Transportation Impact Report, could be implemented to minimize the impacts associated with the shortfall of loading space relative to demand:

“The property management should monitor freight operations to determine if backing of service vehicles is creating disruption of traffic and pedestrian movement along 19th Street. If traffic conflicts arise, the property management should evaluate the need for on-site management to assist in the coordination and management of service vehicles as they enter and exit the site.”

(Comment letters 48h, 52b)

8. Construction impacts – Responses

The Initial Study (Draft EIR, Appendix A) analyzed construction noise (pages 14 to 19), and air quality and dust (pages 19 to 22). Mitigation measures to reduce potentially significant construction effects were identified in the Initial Study. With project sponsor agreement to implement these measures, construction noise and air quality impacts would be mitigated to a less-than-significant level, and thus these impacts were not further analyzed in the Draft EIR.

The temporary traffic impacts associated with construction of the project are summarized on pages 3-36 and 3-37 of the Draft EIR. As noted, Potrero Avenue and 20th Street are the streets that are most likely to be impacted by construction related traffic. The heaviest volumes of truck

traffic would travel to the site during the three- to four-month demolition and excavation phase of the project. The project sponsor is required to work with MUNI and the Department of Parking and Traffic to develop a construction phasing and staging plan for the project that would minimize the temporary impacts on the neighborhood.

The following language is added to Mitigation Measure F.2 on page 4-5 of the Draft EIR to respond to these comments (additions are underlined):

“To ensure that construction activities would not impact MUNI bus stops or routes in the area, prior to construction, the project sponsor shall coordinate with MUNI’s chief inspector.

“The project sponsor and construction contractor(s) shall meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, and the Planning Department to determine feasible traffic measures to reduce traffic congestion and pedestrian circulation impacts during the construction of the proposed project. A Construction Traffic Management Plan shall be submitted to the Department of Parking and Traffic for approval.”

Chapter 4.0 of the Draft EIR contains several mitigation measures to limit and control construction impacts on the neighborhood (including those that were included within the Initial Study). Except for Mitigation Measure F.2, above, these construction measures are repeated here:

“A.1 The project sponsor shall require that the contractors’ equipment and trucks used for project construction utilize the best available noise control techniques (e.g., improved exhaust mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds) in order to minimize construction noise impacts. Prior to project construction, the project sponsor shall require all construction equipment used by the contractor(s) (except for impact tools, pavement breakers and jackhammers) to be tested as part of the environmental compliance monitoring program for enforcement of mitigation measures to ensure that equipment noise does not exceed 80 dBA at 50 feet.

- “A.3 The project sponsor shall require the contractor(s) to use hydraulically or electrically powered impact tools (e.g., jack hammers, pavement breakers, and rock drills) wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust would be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves would be used where feasible, and this could achieve a reduction of 5 dBA.
- “B.1 The project sponsor shall require that the contractor(s) haul and delivery routes avoid residential streets wherever possible.
- “C.1 The project sponsor shall require the contractor(s) to spray the project site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions . . .
- “C.2 The project sponsor shall require the project contractors to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions from equipment that would be in frequent use for much of the construction period.”

Construction equipment could cross over at Mariposa Street, 18th Street, or other streets in industrially zoned areas and thus avoid residential neighborhoods. The City would decide which route would be the most appropriate for construction vehicles with the fewest impacts to the neighborhoods and to public services.

Implementation of these mitigation measures would reduce construction effects on the neighborhood to a less-than-significant level. However, construction effects would still disrupt the neighborhood and be a nuisance. The Planning Commission could, during the project

approval process, add conditions of approval to further lessen these impacts. See also Response 2a – Project approval process.

(Comment letters 2n, 30h, 31h; Public hearing comments 13, 24, 25, 28, 30, 44, 69)

9. Growth Inducement – Responses

Growth inducing impacts are analyzed on page 3-43 of the Draft EIR, including:

“The project would contribute to growth occurring in the vicinity of the project site but would be different in nature than most development (*i.e.*, industrial uses converted to live/work space) occurring in the project vicinity. However, as with live/work conversions, this project would contribute to additional displacement of relatively small businesses including arts-related activities.”

This project would contribute to growth that would displace small businesses. However, this project does not include residential uses and is located in an interim industrial protection zone that does not permit residential conversions. Thus this project would not have an effect on growth contributing to residential displacement. This project would, in fact, increase space available to commercial uses, including small businesses.

For a discussion of impacts to neighborhood character, refer to Response 5a – Visual quality, Response 5d – Building size, and Response 4f – Land use.

(Comment letters 34c, 51h)

10. Population \ Employment

Response 10a – Existing vacancies

The *California Environmental Quality Act (CEQA) Guidelines* § 15125(a) states:

“An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published.”

The Notice of Preparation for this project was published on September 4, 1999. At that time 40 businesses, of which about 25 were arts-related activities, were located on the project site that were scheduled for displacement.

As of June 30, 1999 three manufacturing uses were on site including a sweater manufacturer, a pet collar manufacturer and a coffee roastery. The following uses were also on site: one contractor's office, eight painters, four graphic designers or commercial artists, one fashion designer, two computer design/consultants, three multi-media uses, one jewelry caster, one architect, one urban designer, one film producer, one photographer, one photo studio, two wholesale book businesses, one yoga instructor, one drapery sales, one interior finishes, one dealing with mosaics, and three storage spaces. The metal shed at 2850 - 20th Street contained a contractor's office, auto repair facilities and furniture refinishing.

As of June 1999, about 100 total jobs (including sole-proprietorships) were located on the project site; most of these jobs were industrial or arts-related in nature.

Refer to Response 10b – Business displacement for a discussion of business and employment displacement.

(Comment letter 9e; Public hearing comment 56)

Response 10b – Business displacement

CEQA Guidelines §15131 states:

“(a) Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

“(b) Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant.”

At the time of the EIR analysis, about 40 businesses (of which about 25 were arts-related activities) with about 100 employees (including sole-practitioners) were scheduled for displacement. Since then, the project sponsor has not renewed any leases. The project sponsor states that it has provided assistance, including financial assistance, to many of the displaced tenants. Non-renewal of leases has an economic or social effect on individuals and businesses to be displaced, but does not result in physical changes to the environment.

People who need relatively small, inexpensive commercial and light manufacturing space would be forced to look elsewhere in the City or region for such space. This EIR focuses on physical changes to the project area that could result in potentially significant environmental effects. Socio-economic effects caused by this and other projects are best dealt with in forums that emphasize policy concerns.

As noted on page 11 of the Initial Study (Draft EIR, Appendix A), employment would increase by about 490 on the project block.

During the project approval process, the Planning Commission could impose conditions of approval on the project, including a displacement plan that would give preferential status (including rent reductions) to existing residents. At this time, the project sponsor has not agreed to provide rent reductions for any tenants once the renovation of the 2101 Bryant Street building is complete. Demolition of industrial buildings resulting in displacement of businesses within the interim Industrial Protection Zone, where the project site is located, would require Conditional Use authorization from the Planning Commission.

(Comment letters 4a, 10e, 31m, 34f, 49f, 50d, 51b, 52d; Public hearing comments 56, 65)

Response 10c – Employee densities

Regarding estimated employment on the site, as stated in footnote 2 on page 11 of the Initial Study (Draft EIR, Appendix A):

“This estimate assumes one employee per 275 gross square feet of office (152,600 of office space \div 275 = 555), one employee per 350 gross square feet of retail (9,550 square feet on new retail space \div 350 = 27), and one employee per 435 gross square feet of light industrial space (4,700 square feet of new light industrial \div 435 = 11).”

These are standard employee densities within San Francisco. *Building Code* load factors of one person per 100 square feet of occupancy are used for exiting purposes from a building. This building load factor assumes building visitors, employees not at their own workstations, and perhaps other factors. Offices in San Francisco are not designed for, or occupied by, one person per 100 square feet of space.

(Comment letter 6a)

Response 10d – Employment

Most employees at the project site would be expected to live in the Bay Area. Some employees would move to San Francisco as a result of employment in the City. Others would continue to commute. Because of specific job skills needed for most employment in specific businesses, people tend to be recruited from many places. People filling administrative jobs, building management functions, and other jobs not requiring specific skills in a business are most likely to live within the neighborhood.

A multi-media business may eventually become a tenant at the project site. Employees would be expected to spend most of the day at their jobs, leaving work to eat and shop at local establishments during lunch and other breaks.

As noted by one commenter, the project is not geared toward arts-related activities or employment.

(Comment letters 22d, 49a, 49f, 50d, 51h)

11. Economic Impacts

Response 11a – Property values

Refer to Response 10b – Business displacement above for a direct quote of *CEQA Guidelines* §15131 wherein it states, “Economic or social effects of a project shall not be treated as significant effects on the environment.” The guidelines further state, “Economic or social effects of a project may be used to determine the significance of physical changes caused by the project.”

CEQA provides no basis to analyze or conclude that a potential change in property values is or could be significant unless a significant physical change were to occur on those properties. No such changes are anticipated as a result of the proposed project.

(Comment letters 2c, 18d, 20b, 53a, 58c)

Response 11b – Neighborhood economic impacts

The project, in conjunction with other projects in the area could lead to gentrification of the neighborhood with a resulting increase in rents and business property taxes (upon building turnover) and the inability of some businesses to compete in the market place. As addressed in Response 10b – Business displacement and in Response 11a – Property values, only economic changes that would result in physical changes to the area would be applicable to the EIR analysis under *CEQA*. Gentrification would not be expected to result in adverse physical environmental changes to the area.

(Comment letter 34h)

12. Geotechnical Impacts – Responses

Subsurface Consultants, Inc. prepared a Preliminary Geotechnical Investigation of the project site and its excavation.⁷ They are California-licensed engineers who must meet rigorous licensing standards of the state. Given the liability of a licensed-engineer, the report that they prepared must by nature be conservative. In addition, the Department of Building Inspection has engineers who will peer-review the final report and ensure that engineering for the site meets the most recent code requirements.

(Comment letter 31i)

13. Noise – Responses

In the future, people who work at the project site may or may not live in the immediate neighborhood and thus it is possible that many may not have a vested interest in the area. However, offices are generally fairly quiet neighbors, and workers at offices are not known for causing excessive noise impacts in a neighborhood, especially as compared to industrial uses of current buildings. Noise impacts due to office workers would be expected to be less than significant.

Refer to the Response 8, Construction impacts, above, for a discussion of construction noise effects.

(Comment letter 3c)

14. Fire safety – Responses

During the p.m. peak hour 19th Street currently carries traffic volumes in the range of 160 to 180 two-way trips. These are relatively low volumes of traffic compared to other streets in the area. Traffic on 19th Street is not currently congested nor is it projected to be in the future when the Bryant Square project and other cumulative projects in the area are completed. (See the Cumulative 2010 traffic analysis on page 3-29 of the Draft EIR.) However, 19th Street may

⁷ Subsurface Consultants, Inc., Preliminary Geotechnical Investigation, Bryant Square Project, 19th, Bryant, 20th, and York Streets (Block 4080), San Francisco, California, September 1998.

experience some localized traffic delays associated with backing of service vehicles onto the streets. As in other parts of the city emergency vehicles would have the right-of-way and traffic would generally have adequate opportunity to pull over to the side of the street to let a fire engine or other emergency vehicle pass.

The Department of Parking and Traffic is charged with enforcement of parking violations. Double-parked vehicles are an on-going problem which would be expected to be solved by towing them from City streets, as is the current situation. The originally proposed project would be expected to aggravate the problem due to not supplying enough parking to meet demand. However, since publication of the Draft EIR, the project has been revised and would now be expected to meet parking demand on site through implementation of valet parking operations.

(Comment letter 45e)

15. Quality of life – Responses

Quality of life is by nature subjective and is impossible to quantify in an EIR. This is also a socioeconomic issue best dealt with in a policy forum, and can be considered during the approval process. Refer to Response 2a – Project approval process.

(Comment letters 2f, 12a, 45c; Public hearing comment 38)

16. Community controversy – Responses

CEQA Guidelines §15064 states: “that controversy alone, without substantial evidence of a significant effect, does not trigger the need for an EIR.”

Public controversy, by itself is not a substantial environmental impact to be evaluated within an EIR. Moreover, public controversy about an issue is not substantial evidence of the existence of other types of environmental impacts. (*CEQA* §21082.2(b))

The Planning Commission may consider views held by members of the public to determine whether the project “on balance” is consistent with the *General Plan* and its policies, and otherwise merits approval. Any public controversy identified by the Planning Commission in the

context of its balancing test would not alter the potential physical environmental impacts of the project, as described in the EIR.

(Public hearing comment 68)

17. Cumulative Impacts

Response 17a – Cumulative Development

Under §15130(a) of the *CEQA Guidelines*, an EIR is required to discuss the cumulative impacts of a project when such impacts are cumulatively considerable. *CEQA Guidelines* §15065(c) states: “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects . . .” Furthermore, *CEQA Guidelines* provide that an EIR may determine a project’s contribution to a significant cumulative impact is *de minimus* and thus not significant. *CEQA Guidelines* §15130(4) states: “A *deminimus* contribution means that the environmental conditions would essentially be the same whether or not the proposed project is implemented.”

CEQA Guidelines §15130(b)(1)(A) and (B): allows cumulative effects to be based on either “a list of past, present, and probable future projects producing related or cumulative impacts” or “a summary of projections contained in an adopted general plan or related planning document . . .”

Cumulative analyses for employment and housing impacts were from city-wide projections contained in the Mission Bay EIR. Construction effects are localized so nearby development (720 York Street in this case) was analyzed to see if any construction effects would overlap. Hazardous and geotechnical effects are also localized, so only projects in the immediate area are applicable. Cumulative air quality and traffic effects were analyzed based on the cumulative transportation analysis.

For transportation growth, the cumulative 2010 analysis conducted for Bryant Square uses an annual background growth rate of one percent per year that has been established for most areas outside the downtown. This projection of background growth, in combination with the project

traffic, accounts for the development occurring in the project area. Development from the 720 York Street project is accounted for in this background growth rate and is accounted for in the traffic and parking analyses. The rate is consistent with findings from other transportation studies conducted in the area that indicate intersection levels of service would operate at LOS C or better even with development proposed in the area.⁸

In general, it is rare in San Francisco for streets to have a one percent per year sustained growth rate over a period of years. In areas where studies have been prepared (*i.e.*, South of Market, Mission Bay), traffic growth is less than this rate. The Planning Department uses the one percent rate as a conservative case, as described in the San Francisco Planning Department, *Guidelines for Environmental Review: Transportation Impacts*, prepared in July 1991.⁹

With one exception, the transportation impacts resulting from the implementation of the Bryant Square project and cumulative development in the area were not identified as significant when compared to the significance criteria outlined on page 3-24 of the Draft EIR.

One potentially significant cumulative transportation impact was identified – the increase in delays occurring at the 23rd Street and Potrero Avenue intersection. This intersection would continue to operate at LOS F under the Cumulative 2010 condition, but the increase in delays would result in significant traffic impacts. The Bryant Square project would contribute 10 percent of the cumulative growth at this significantly impacted intersection. However, with mitigation identified in the Draft EIR to modify signal timing at the intersection, the cumulative impact would be less than significant. Because of the minor costs associated with this measure, the City would not be expected to place a fee on its implementation. All other intersections operate at LOS C or better under existing and future conditions, which is considered acceptable under City of San Francisco standards.

The average capacity utilization for bus lines serving the project area range from a low of 28 percent to a high of 84 percent.¹⁰ All but two of these bus lines are classified as policy lines, *i.e.*,

⁸ Korve Engineering, *1900 Bryant Street Transportation Study*, May 13, 1998.

⁹ Wycko, Bill, Senior Transportation Planner, San Francisco Planning Department, conversation, February 25, 2000.

¹⁰ The Duffey Company, *Bryant Square Project Final Transportation Impact Report*, San Francisco Municipal Railway Bus Data information collected for 1997/98 and as reported on Table 2, September 9, 1999.

operating at peak period headway greater than 10 minutes. Reasonable downtown-oriented service is available only on the 9–San Bruno bus line and reasonable crosstown-oriented service is available on the 22–Fillmore bus line, which is located a distance from the project site. The project-generated trips (30 outbound on seven bus lines) could be accommodated on the existing transit lines. No significant transit impacts were identified. Based on their expertise, traffic engineers in the Planning Department determined that no significant cumulative transit effects could occur, given excess capacity in the area, and determined that no cumulative transit analysis need be conducted for the project.

The competition for limited parking in the neighborhood would increase with the implementation of the project and other cumulative development, but parking shortfalls relative to demand are not considered to be significant impacts based on the city’s “Transit First” policy. (See Response 7c – Parking congestion for a discussion of this policy.) Implementation of the Increased Parking Variant to the Parking-Demand Compliant Alternative would lessen the project’s share of the cumulative parking impact to a *de minimus* level, by meeting the parking requirement and demand on-site through the use of valet-assisted parking.

The Draft EIR includes a discussion of the cumulative impacts of the project as required under *CEQA*. In accordance with the *CEQA Guidelines* sections quoted above, the Draft EIR concludes that, with the implementation of mitigation measures identified in the Draft EIR, the cumulative impacts related to transportation are not significant. The project’s contribution to cumulative traffic is *de minimus* as the environmental conditions would essentially be the same whether or not the proposed project is implemented.

The parking requirements outlined in the *San Francisco Planning Code* and the City’s “Transit First” policy attempt to balance the need for parking to serve new developments and the desire to encourage alternative modes of travel by limiting the amount of parking provided.

If the amount of parking provided for new developments is limited, then the alternative modes of transportation need to provide viable commute alternatives. The transit service levels at the site can accommodate moderate levels of transit ridership, but would need to be expanded to accommodate higher levels of transit patrons commuting to this neighborhood. About 18 percent

of the project trips during the p.m. peak hour are projected to travel by transit. The majority of the transit trips are by MUNI, but some are projected to occur on the regional transit systems.

If transit service improvements are provided by MUNI in the future, the percentage of employees commuting by bus may increase.

(Comment letters 6e, 10b, 31a, 31b, 31f, 31k, 31o, 48a, 49c, 51g, 54a; Public hearing comments 2, 5, 9, 37, 67, 71)

Response 17b – Cumulative local air quality

As discussed in the Initial Study (Draft EIR, Appendix A), a micro-scale air quality impact analysis was conducted at seven study intersections. Traffic congestion leads to carbon monoxide emissions at local intersections. Under worst-case conditions, estimated carbon monoxide levels would not exceed (violate) one-hour state or federal standards. With respect to the eight-hour carbon monoxide State and federal standards, two study intersections currently have local exceedances (violations). These exceedances would continue to occur with the project and cumulative development. By 2010, neither the project nor future cumulative development would contribute to a carbon monoxide exceedance. Thus neither project-related or cumulative development would result in a significant cumulative effect. Future cumulative development for air quality is based on the cumulative traffic analysis, which is discussed in Response 17a – Cumulative development.

(Public hearing comments 5, 67)

18. Mitigation Measures

CEQA Guidelines §15126.4(a) states:

“(1) An EIR shall describe feasible measures which could minimize significant adverse impacts . . .

“(A) The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.”

Although the building size may seem inappropriate to commenters located next to lower and smaller-scale nearby residential uses, the Planning Department has not determined the effect to be significant, and thus no mitigation measures would be warranted. Refer to Response 5d – Building size.

Page 4 of the Draft EIR includes the following mitigation measures for air quality:

“C.1 The project sponsor shall require the contractor(s) to spray the project site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require that the contractors obtain reclaimed water from the Clean Water Program for this purpose.

“C.2 The project sponsor shall require the project contractors to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions from equipment that would be in frequent use for much of the construction period.”

With implementation of these mitigation measures, construction-related air quality would be a less-than-significant effect.

Diesel buses currently serve the project area. This is an existing condition and would not be caused by the project or by cumulative development. No impacts to be mitigated result from an existing use.

The Draft EIR describes existing conditions in the area with respect to traffic, transit and parking. The Draft EIR also identifies the projected traffic, transit and parking impacts of the proposed project, and describes cumulative traffic increases at a number of area intersections. One commenter's perception of existing and projected conditions is not borne out by the analysis in the Draft EIR. In fact, with the exception of the intersection at 23rd Street and Potrero Avenue, all studied intersections operate today at Level of Service C or better, and all remain at Level of Service C or better both with the project and with future cumulative development.

The intersection at the corner of 23rd Street and Potrero Avenue, adjacent to San Francisco General Hospital, operates now at Level of Service F. If mitigation measures were not implemented, delays at this intersection would increase by approximately 5 seconds with the project, and would nearly double with cumulative development in the year 2010. This would be a significant cumulative traffic effect. The project's share of this increased traffic would be 10 percent.

Mitigation Measure F1, modification of the signal timing at 23rd Street and Potrero Avenue, would reduce both project and future cumulative impacts to less-than-significant levels. With the implementation of this measure, expected delays at this intersection in the year 2010 would be comparable to what currently exists.

CEQA requires the Draft EIR to identify feasible measures to minimize significant adverse impacts, but does not require identification of measures to improve existing conditions which are not materially changed as a result of the project or the cumulative scenario, or for impacts that would be less than significant. While the City may want to take steps to improve the existing Level of Service F condition at the Potrero Avenue and 23rd Street intersection, that condition is not an impact of the project. With the implementation of mitigation measures identified in the

Draft EIR, neither the project nor the cumulative scenario would have a significant traffic impact at this or any other studied intersection.

One commenter wants a more specific mitigation for construction traffic. Many considerations are used to determine the construction traffic route, including emergency vehicle routes, schools, transit routes, residential neighborhoods, and others. That is why so many City Departments must be consulted to jointly determine which route would be best. In order to avoid residential neighborhoods, construction equipment could cross over at Mariposa Street, 18th Street, or other streets in industrially zoned areas. The City would decide which route would be the most appropriate for construction vehicles with the fewest impacts to the neighborhoods and to public services. Any additional information needed by the joint departments would be requested at that time.

See also Response 8 – Construction impacts for a further discussion of construction impacts and mitigation measures and for revisions to Mitigation Measure F.2 to require submittal of a Construction Traffic Management Plan.

(Comment letters 4a, 34p, 34s, 48b; Public hearing comments 25, 28, 70)

19. Significant Effects

Response 19a – Significant parking impacts

The competition for limited parking in the neighborhood would increase with the implementation of the project and other cumulative development, but parking shortfalls relative to demand are not considered to be significant impacts. (See Response 7c – Parking congestion for a discussion of the “Transit First” policy, above.) Thus no mitigation measures for a parking shortfall would be warranted. In addition, implementation of the Increased Parking Variant to the Parking-Demand Compliant Alternative would lessen the project’s share of the cumulative parking impact to a *de minimus* level, by meeting the parking requirement and demand on-site through the use of valet-assisted parking.

(Comment letter 5g)

Response 19b – Severe environmental damage

CEQA Guidelines §15382 states:

“‘Significant effect on the environment’ means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

The EIR includes significance criteria to determine whether an impact would be “significant” under *CEQA*. For those impacts that have been identified as potentially significant, mitigation measures have been identified in the EIR and the project sponsor has agreed to implement all of those applicable to the sponsor. Thus project implementation would not result in any significant adverse impacts.

(Comment letter 45g)

20. Alternatives**Response 20a – Alternatives: Reduced Height**

CEQA Guidelines §15126.6 (a) states:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.”

Given (1) the existing 65-foot height limit on the project block, (2) the neighboring 2101 Bryant Street historic building is three-stories tall, and (3) the 720 York Street building is three stories tall to the roof ridge, analysis of a two-story tall alternative would not be reasonable and the lead agency has declined to consider analyzing that alternative. Such an alternative would not reduce or eliminate any significant environmental impact.

In response to several comments, a variant has been added to 6.3 Reduced Height Alternative. Page 6-2 of the Draft EIR, a new third paragraph has been added under Description (additions are underlined):

“A variant to this alternative would retain two levels of subsurface parking, providing the same amount of parking as the project. The remainder of the alternative would be the same.”

Page 6-3 of the Draft EIR, a new paragraph has been added after the fourth paragraph on the page (additions are underlined):

“For the increased parking variant, if 45 parking spaces were made available to 720 York Street, then this variant would result in a parking demand shortfall of 80 spaces compared to 151 spaces for the project. If valet operations were implemented, this variant would result in a parking demand surplus of 18 spaces compared to a deficit of 122 spaces for the project. All other impacts of the increased parking variant would result in the same impacts as for the main alternative.”

Page 6-3, first paragraph under Project Sponsor’s Reasons for Rejection has been rewritten as follows (revisions are underlined):

“The project sponsor has rejected this alternative because it would provide a reduced amount of modern office space for the information technology industry than the project

The Reduced-Height Alternative would lower total development on the site by about 20 percent. One commenter requested that an alternative that would reduce development by 17 percent be analyzed. Impacts of a project that would reduce development by only 17 percent would fall within the range of this alternative and the Parking-Demand Compliant Alternative.

Since publication of the Draft EIR, the project sponsor has changed the project to a new Increased Parking Variant of the Parking-Demand Compliant Alternative. Refer to Section 5.2 Addenda to the Draft EIR for a description and photomontage of this alternative.

Shadow and wind effects would be less than significant for the project, the Parking-Demand Compliant Alternative, and this alternative. Refer to Response 5e – Shadows.

(Comment letters 2o, 5d, 5i, 5o, 5p, 5t, 9d, 18f, 45h, 48j, 58b)

Response 20b – Alternatives: Industrial

Because no significant land use effects have been found, the sponsor has not reconsidered implementing the Industrial Alternative.

A variant to the project could be considered that would retain industrial land uses within the 2101 Bryant Street building, after renovation and the building addition. The remainder of the project would be the same as analyzed in the Draft EIR. Impacts would be identical to those of the project except that traffic and parking impacts would be expected to be less than with the proposed project. Impacts of this alternative would be within the range of alternatives considered in the Draft EIR. The Planning Commission could consider such an alternative. Refer to Response 2a – Project approval process.

(Comment letters 9f, 49g)

Response 20c – Alternatives: Design

One commenter requested inclusion of an alternative that would be similar to the Parking-Demand complying alternative except that it would be stepped back from the corner, allowing open space at the corner of Bryant and 20th Streets. Though not included with the EIR, this alternative would not have exceptions to the bulk requirements, the same as with the Parking-Demand Compliant Alternative.

This alternative would retain more of the view of the 720 York Street building than would the project or the currently proposed variant to the Parking-Demand Compliant Alternative. However, open space on the corner could not be secured in the same way as open space that is interior to the project site. This corner open space could cause minor land-use impacts due to people using the open space after hours, causing an annoyance to residences across the street.

Other impacts of this alternative would fall within the range of impacts of the increased parking variant to the Reduced Height Alternative and the Parking-Demand Compliant Alternative.

(Comment letters 34m, 34o)

Response 20d – Alternatives: Reduced Parking

The parking impacts associated with the project and documented in the Draft EIR are not identified as significant even though a parking-demand shortfall of 151 parking spaces could occur. This finding is in keeping with the city's treatment of parking impacts, which does not identify parking shortfalls relative to demand as a significant environmental impact. (See Response 7c – Parking congestion for a discussion of the "Transit First" policy, above.) Projects are, however, expected to meet *Planning Code* parking standards. To include an alternative that would further reduce on site parking would help contribute to the already saturated parking conditions in the area and would not meet code-required parking standards. The Planning Department has declined to consider analyzing an alternative with additional reductions to parking.

(Comment letters 10b, 49d; Public hearing comment 2)

Response 20e – Off-site Alternatives

The EIR must only analyze "alternatives that are capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance." (*San Joaquin Raptor Wildlife Rescue Center v. County of Stanislaus*, 1994, 27 Cal App.4th 713, 736.) Because the EIR has shown that the proposed project would not result in any significant effects, no alternatives are required in the EIR to eliminate or reduce the already less-than-significant effects.

SKS Investments, Inc. states that it does not currently own other property within the area, except for completed projects at 2300 Harrison Street and at 500 Treat Avenue. Because no potentially significant effects that could not be mitigated would occur with the project, no environmental benefit under *CEQA* would occur by not developing this lot.

(Comment letter 34u)

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TEXT CHANGES TO THE DRAFT EIR

5.1 INTRODUCTION

The following corrections and changes are made to the Draft Environmental Impact Report. These changes are incorporated as part of the Final Environmental Impact Report. Revised or new language is underlined. Text that is deleted and not replaced is indicated by strikeovers.

These changes have been made as part of a response to comment on the Environmental Impact Report or have been initiated by the City and County of San Francisco to correct the Draft Environmental Impact Report. Where a text change is made as part of a response to a public comment, the response to comment number is noted in parenthesis before the text change. Where a text change is made to clarify the EIR, errata is stated in parentheses before the text change. Where a text change is made to update the EIR, staff-initiated text change is stated in parentheses before the text change.

5.2 ADDENDA TO THE DRAFT EIR

Page 1-5, paragraph four, has been revised as follows (*Response 1a – Project description*):

“...When compared to the estimated 309 space parking demand, the 301 total parking spaces ~~(including valet assisted space and minus 16 spaces reserved for 720 York Street live/work units)~~ (203 independently accessible, expanded to 301 through on-site valet-assisted parking) provided for the Bryant Square project would result in a 24-space shortfall. This accounts for an allocation of 16 parking spaces to the 720 York Street live/work project. When comparing this parking demand to the 203 independently accessible spaces, a 122-space shortfall would result (accounting for allocation of 16 parking spaces to the 720 York Street project.) The result of the parking shortfall associated with the development of the proposed project would be increasing competition for limited on-street parking, which is currently near or exceeding capacity.

Page 1-15, the Parking-Demand Compliant Alternative has been revised as follows (*Response 1a – Project description and Staff-Initiated Text Change*):

“An alternative is under consideration that would reduce the size of the two proposed new structures at Bryant Square and the proposed retail area in the project, while increasing the amount of on-site parking compared to the project. The total proposed ~~new~~ area would be 155,675 square feet compared to 166,815 square feet with the project.

“The alternative would include about 146,050 square feet of office, 5,000 square feet of retail, and 4,700 square feet of light industrial space compared to about 152,600 gross square feet of office, about 9,550 gross square feet of retail, and about 4,700 square feet of light industrial space with the project. The underground parking garage would provide 260 independently-accessible (or 306 valet) parking spaces on 3 subsurface levels, compared to 203 independently-accessible (or 301 valet) parking spaces on two ~~parking~~ levels with the project. ”

“This alternative would be essentially the same as the project except for changes to the proposed new structure at 2125 Bryant Street and its underground parking garage, and to the proposed new structure at 700 York Street. The new Bryant Street building would contain about 109,200 square feet of office and about 5,000 square feet of retail, compared to 114,550 square feet of office and about 7,500 square feet of retail with the project. The new building at 700 York Street would contain about 2,050 square feet of office space compared to about 2,050 square feet of retail space and 2,050 square feet office space with the project. The same three buildings that would be demolished for the project would be demolished for this alternative. ~~Both~~ The 2101 Bryant Street building renovations that would occur with the project would occur with this alternative. The addition to the 2101 Bryant Street building would be about 4,800 square feet compared to 6,000 square feet for the project. This alternative would comply with bulk limits on the project block while the proposed project would not.

“A variant to this alternative, referred to as the Increased Parking Variant, would total 159,015 square feet in size, or 3,340 square feet larger than the alternative as described above. The Increased Parking Variant would include about 152,840 square feet of office

space, about 1,500 square feet of retail space, and about 4,700 square feet of light industrial space. The new building at 2125 Bryant Street would contain about 113,500 square feet of office space compared to about 109,200 square feet with the main alternative and about 114,550 square feet with the project. The new building at 700 York Street would contain about 4,100 square feet of office space compared to about 2,050 square feet of office with the main alternative. The addition to the 2101 Bryant Street building would be about 6,000 square feet for the variant compared to 4,800 square feet for the main alternative. Like the proposed project, this variant would not comply with bulk limits on the project block.

“In the Increased Parking Variant, the underground parking garage would provide the same three-level underground parking garage accommodating 260 independently-accessible spaces, as described in the main alternative. By operating the entire garage on an attendant basis, the variant would supply 339 valet spaces, an increase of 33 valet-assisted spaces over the main alternative.”

“Land use impacts would be the same for this alternative and its variant as for the project, however the intensity of development, except for parking, would be somewhat less. Views of the site would be similar to views of the project although this alternative would be slightly smaller. This alternative would be about the same height and bulk as the proposed project. The alternative would not require a bulk exception while its variant and the project would. The variant, although requiring a bulk exception, would appear less bulky at the corner of Bryant and 19th Streets where a relatively large three-story corner element has been added. The alternative would develop this corner to the maximum allowable bulk which would be four-stories tall across the lot.

“Impacts on the historic building would be the same for the alternative or its variant as with the less-than-significant historic structure effects of the project.

“This alternative would provide adequate parking to meet parking demand on site in independently accessible parking spaces compared to valet operations with the project. and a 24 space parking shortfall. However, valet-assisted parking would be used to meet the additional demand from the 720 York Street building. The Increased Parking Variant

would supply surplus parking to meet demand through provision of 339 valet-assisted parking spaces.

“Site circulation would be the same for this alternative as for the project.

“This alternative would generate about 2,516 daily trips compared to about 3,324 for the project. A total of about 180 p.m. peak hour trips would occur with this alternative compared to 218 for the project. During the p.m. peak hour 122 automobile trips, 32 transit trips, 20 pedestrian trips, and about six bicycle trips would occur to/from the project site with this alternative, compared to 148 automobile trips, 39 transit trips, 24 pedestrian trips, and seven bicycle trips for the project. Total trips from the variant would be less (2,463 trips compared to 2,516 trips with the main alternative) due to a decrease in retail uses on site. As with the project, this alternative would contribute to significant cumulative traffic increases at the 23rd Street and Potrero Avenue intersection in 2010, which would be reduced to a less-than-significant level by implementing the mitigation measures identified in the EIR.

“Less-than-significant temporary construction noise, traffic and air quality impacts would occur on the Bryant Square site although the duration of impacts would be expected to be greater for this alternative than for the project due to excavation and construction of a third underground parking level. The same number of temporary construction jobs for building the project would be expected for this alternative.

“No significant impacts that could not be avoided would occur due to operation of either this alternative or the project on the following other topics: population, noise, air quality and wind, public services and utilities, biology, water, hazardous materials, energy, geology, seismicity and soils, archaeological resources, and growth inducing effects.

“This alternative would be generally consistent with the project sponsor’s objectives. The project sponsor is now proposing the Increased Parking Variant, although the variant would provide a reduced amount of modern office space for the information technology industry and would provide fewer jobs on site than the proposed project.”

Page 2-4, Bullet A, the first sentence has been revised (*Response 4f – Land use*):

“A. 2101 Bryant Street, an existing approximate 24,000 square-foot building on the corner of Bryant and 19th Streets would be seismically upgraded and renovated from light manufacturing, offices, and arts-related activities to offices.”

Page 2-4, Bullet A, the second sentence has been revised as follows (*Response 1a – Project description*):

“A new partial fourth floor containing about 6,000 square feet would be added to the top, which would now be about 55-feet tall.”

Page 2-5: Existing Buildings and Figure 2-6: Site plan have been revised as shown below to include address of the existing and proposed buildings, and to correct the building outline on the site plan (*Response 1b – Project plans*).

Page 2-7, Bullet E, first sentence has been revised as follows (*Response 1a – Project description*):

“2125 Bryant Street, a new approximate 122,050 square-foot office building five-floors (65-feet) tall would be constructed after demolishing the existing wood-frame structure at 2125 Bryant Street and the metal shed behind it at 2850 - 20th Street.”

Page 2-7, Bullet E, third sentence has been revised as follows (*Response 1a – Project description*):

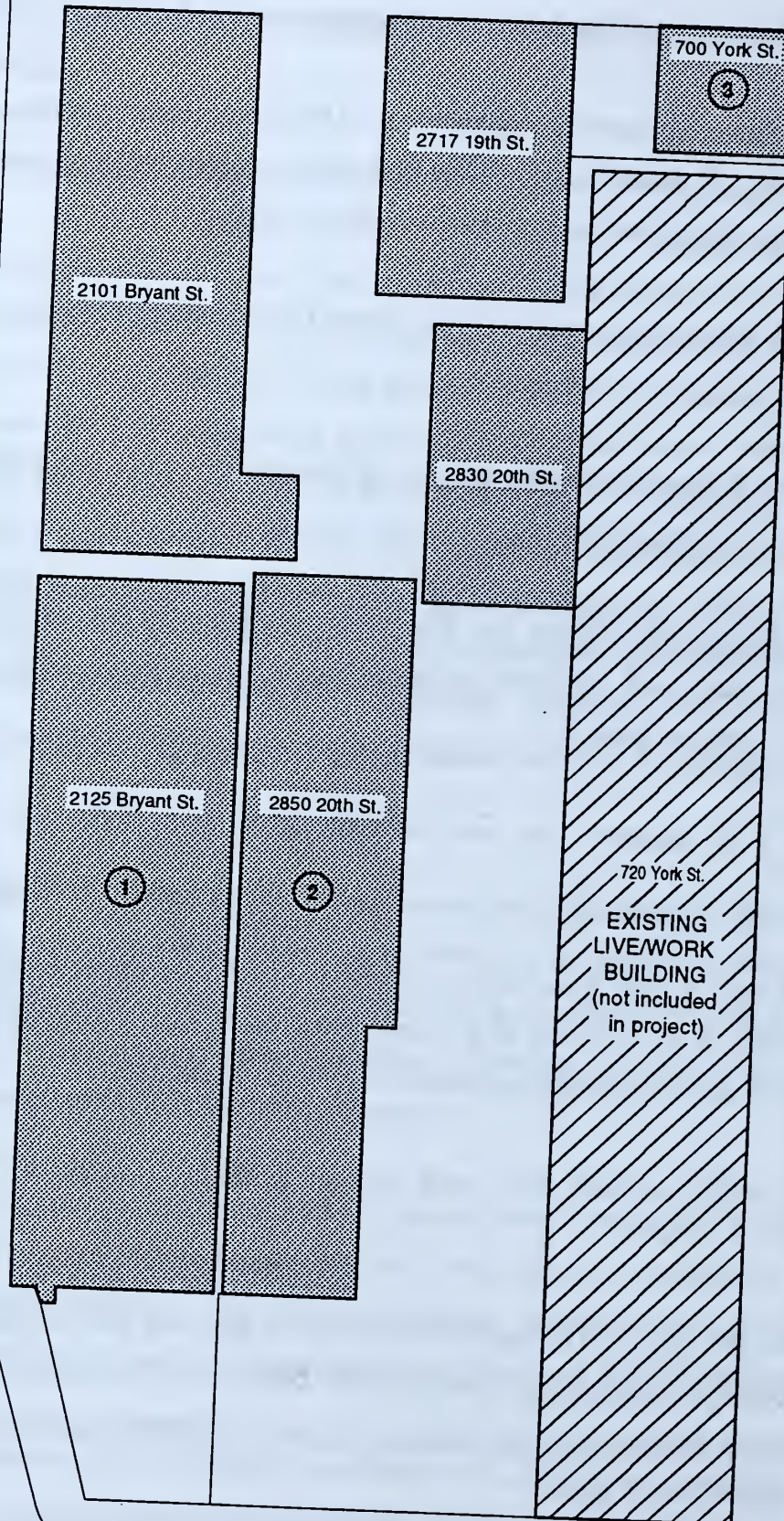
“Two subsurface levels would be excavated under this building and the adjacent courtyard for an underground parking garage containing 203 independently-accessible ~~and 301 valet-assist~~ assist-parking stalls (expanded to 301 spaces through valet-assisted parking operations) in about 61,850 square feet of space.”

Page 2-7, Table 1, under 2101 Bryant Street, “offices” are added as an existing land use (*Response 4f – Land use*).

BRYANT STREET

19th STREET

YORK STREET



Numbers indicate
buildings to be
demolished



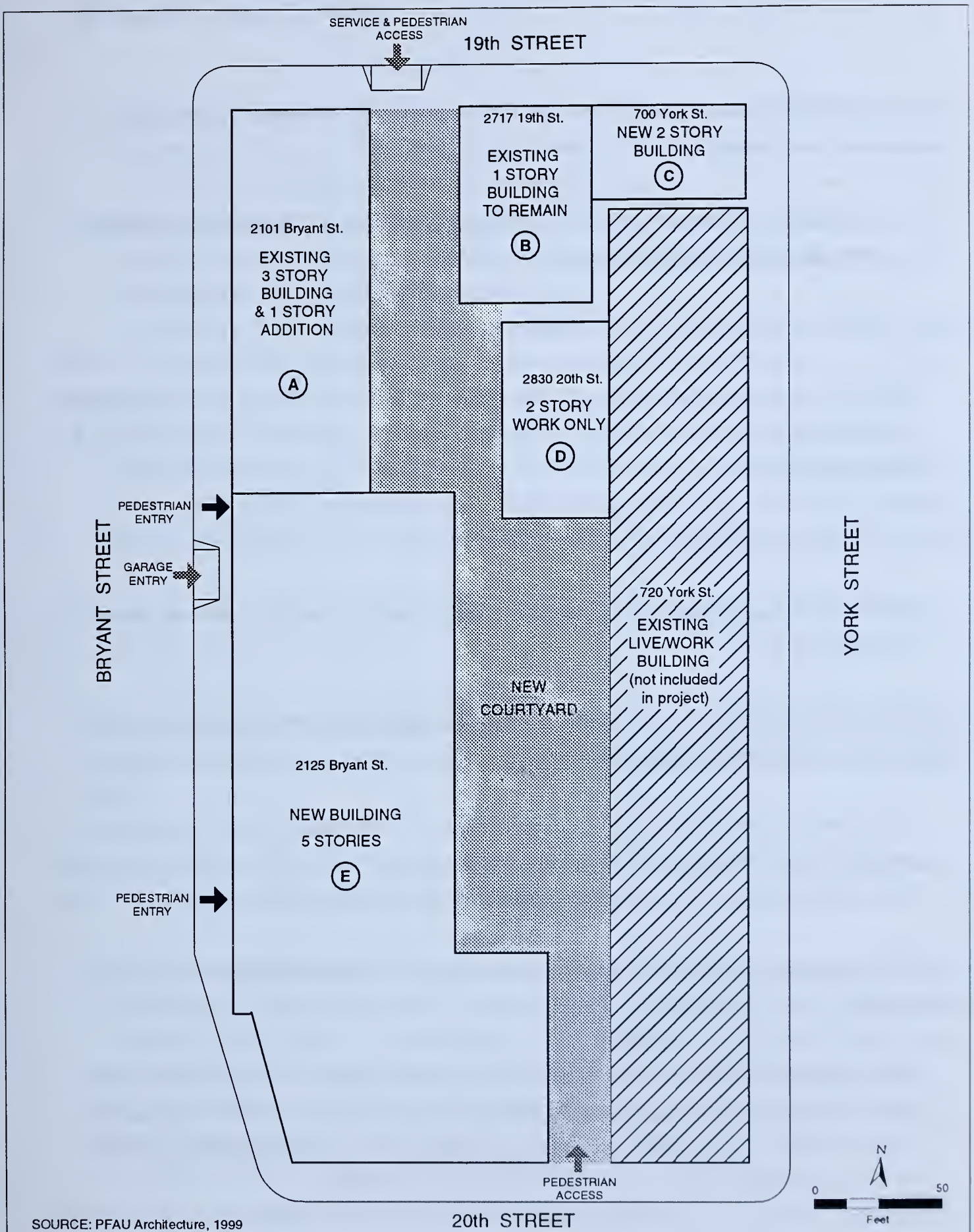
SOURCE: PFAU Architecture, 1999

20th STREET

Bryant Square
Project

Figure 2: Existing Buildings

Maxwell &
Associates



SOURCE: PFAU Architecture, 1999

Bryant Square
Project

Figure 3: Site Plan

Maxwell &
Associates

Page 2-12 of the Draft EIR has been revised as follows to add this new objective (*Response 1c – Project sponsor’s objectives*):

“8. Develop a project that creates an adequate return for its investors and adequate security for its lenders.”

Page 3-5, land uses across Bryant Street are described as follows (*Response 4f – Land use*):

“West of the project block across Bryant Street are a mix of one- to three-story uses, including one restaurants ~~(one with a bar)~~, offices, and light industrial uses, and single- and multi-family residences.”

Page 3-9, last paragraph (*Response 1a – Project description*):

“The five-story, 65-foot tall, Bryant Square project would be taller than other structures in the immediate area.

Page 3-31, third sentence of the second to the last paragraph has been revised as follows (*Response 1a – Project description*):

“The Bryant Square project proposes to provide a total of 301 valet-assisted parking spaces (or 203 independently accessible parking spaces) on-site to serve the needs of both the Bryant Square project and the recently constructed 720 York Street live/work units.”

Page 3-33, paragraph two, sentence three has been revised as follows (*Response 1a – Project description*):

“This represents a surplus of 13 spaces above the code required parking for the Bryant Square project. When compared to the estimated parking demand, the 301 total parking spaces (including valet-assisted spaces) (or 203 independently accessible spaces) provided for the Bryant Square project would result in a 24-space shortfall....”

Page 4-5, the second paragraph under Mitigation Measure F.2 has been revised as follows (*Response 8. Construction impacts*):

“The project sponsor and construction contractor(s) shall meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, and the Planning Department to determine feasible traffic measures to reduce traffic congestion and pedestrian circulation impacts during the construction of the proposed project. A Construction Traffic Management Plan shall be submitted to the Department of Parking and Traffic for approval.”

Page 6-2, the last sentence under Description has been revised as follows (*Response 1a – Project description*):

“This alternative would provide 102 independently accessible or 145 valet parking spaces on one parking level, compared to 203 independently accessible or 301 valet parking spaces on two parking levels with the project.”

Page 6-2 of the Draft EIR, a new third paragraph has been added under Description (*Response 20a – Alternatives: Reduced Height*):

“A variant to this alternative would retain two levels of subsurface parking, providing the same amount of parking as the project. The remainder of the alternative would be the same.”

Page 6-3 of the Draft EIR, a new paragraph has been added after the fourth paragraph on the page (*Response 20a – Alternatives: Reduced Height*):

“For the increased parking variant, if 45 parking spaces were made available to 720 York Street, then this variant would result in a parking demand shortfall of 80 spaces compared to 151 spaces for the project. If valet operations were implemented, this variant would result in a parking demand surplus of 18 spaces compared to a deficit of 122 spaces for the project. All other impacts of the increased parking variant would result in the same impacts as for the main alternative.”

Page 6-3, first paragraph under Project Sponsor’s Reasons for Rejection has been rewritten as follows (*Response 20a – Alternatives: Reduced Height*):

“The project sponsor has rejected this alternative because it would provide a reduced amount of modern office space for the information technology industry than the project

Page 6-7, the text is changed to add a new variant to Section 6.5 of the EIR and to correct and clarify the original Parking-Demand Compliant Alternative (*staff-initiated text change*):

“Description

An alternative is under consideration that would reduce the size of the two proposed new structures at Bryant Square and the proposed retail area in the project, while increasing the amount of on-site parking compared to the project. The total proposed ~~new~~ area would be 155,675 square feet compared to 166,815 square feet with the project.

“The alternative would include about 146,050 square feet of office, 5,000 square feet of retail, and 4,700 square feet of light industrial space compared to about 152,600 gross square feet of office, about 9,550 gross square feet of retail, and about 4,700 square feet of light industrial space with the project. The underground parking garage would provide 260 independently-accessible (or 306 valet) parking spaces on 3 subsurface levels, compared to 203 independently-accessible (or 301 valet) parking spaces on two ~~parking~~ levels with the project. ”

“This alternative would be essentially the same as the project except for changes to the proposed new structure at 2125 Bryant Street and its underground parking garage, and to the proposed new structure at 700 York Street. The new Bryant Street building would contain about 109,200 square feet of office and about 5,000 square feet of retail, compared to 114,550 square feet of office and about 7,500 square feet of retail with the project. The new building at 700 York Street would contain about 2,050 square feet of office space compared to about 2,050 square feet of retail space and 2,050 square feet office space with the project. The same three buildings that would be demolished for the project would be demolished for this alternative. ~~Both The 2101 Bryant Street~~ building renovations that would occur with the project would occur with this alternative. The addition to the 2101 Bryant Street building would be about 4,800 square feet compared to 6,000 square feet for the project. This

alternative would comply with bulk limits on the project block while the proposed project would not.

“A variant to this alternative, referred to as the Increased Parking Variant, would total 159,015 square feet in size, or 3,340 square feet larger than the alternative as described above. The Increased Parking Variant would include about 152,840 square feet of office space, about 1,500 square feet of retail space, and about 4,700 square feet of light industrial space. The new building at 2125 Bryant Street would contain about 113,500 square feet of office space compared to about 109,200 square feet with the main alternative and about 114,550 square feet with the project. The new building at 700 York Street would contain about 4,100 square feet of office space compared to about 2,050 square feet of office with the main alternative. The addition to the 2101 Bryant Street building would be about 6,000 square feet for the variant compared to 4,800 square feet for the main alternative. Like the proposed project, this variant would not comply with bulk limits on the project block.

“In the Increased Parking Variant, the underground parking garage would provide the same three-level underground parking garage accommodating 260 independently-accessible spaces, as described in the main alternative. By operating the entire garage on an attendant basis, the variant would supply 339 valet spaces, an increase of 33 valet-assisted spaces over the main alternative.”

“Impacts

“Land use impacts would be the same for this alternative and its variant as for the project, however the intensity of development, except for parking, would be somewhat less. Views of the site would be similar to views of the project although this alternative would be slightly smaller. This alternative would be about the same height and bulk as the proposed project. The alternative would not require a bulk exception while its variant and the project would. The variant, although requiring a bulk exception, would appear less bulky at the corner of Bryant and 19th Streets where a relatively large three-story corner element has been added. The alternative would develop this corner to the maximum allowable bulk which would be four-stories tall across the lot.

“The project sponsor has rejected this alternative because it would provide a reduced amount of modern office space for the information technology industry than the project

Page 6-7, the text is changed to add a new variant to Section 6.5 of the EIR and to correct and clarify the original Parking-Demand Compliant Alternative (*staff-initiated text change*):

“Description

An alternative is under consideration that would reduce the size of the two proposed new structures at Bryant Square and the proposed retail area in the project, while increasing the amount of on-site parking compared to the project. The total proposed ~~new~~ area would be 155,675 square feet compared to 166,815 square feet with the project.

“The alternative would include about 146,050 square feet of office, 5,000 square feet of retail, and 4,700 square feet of light industrial space compared to about 152,600 gross square feet of office, about 9,550 gross square feet of retail, and about 4,700 square feet of light industrial space with the project. The underground parking garage would provide 260 independently-accessible (or 306 valet) parking spaces on 3 subsurface levels, compared to 203 independently-accessible (or 301 valet) parking spaces on two ~~parking~~ levels with the project. ”

“This alternative would be essentially the same as the project except for changes to the proposed new structure at 2125 Bryant Street and its underground parking garage, and to the proposed new structure at 700 York Street. The new Bryant Street building would contain about 109,200 square feet of office and about 5,000 square feet of retail, compared to 114,550 square feet of office and about 7,500 square feet of retail with the project. The new building at 700 York Street would contain about 2,050 square feet of office space compared to about 2,050 square feet of retail space and 2,050 square feet office space with the project. The same three buildings that would be demolished for the project would be demolished for this alternative. ~~Both~~ The 2101 Bryant Street building renovations that would occur with the project would occur with this alternative. The addition to the 2101 Bryant Street building would be about 4,800 square feet compared to 6,000 square feet for the project. This

alternative would comply with bulk limits on the project block while the proposed project would not.

“A variant to this alternative, referred to as the Increased Parking Variant, would total 159,015 square feet in size, or 3,340 square feet larger than the alternative as described above. The Increased Parking Variant would include about 152,840 square feet of office space, about 1,500 square feet of retail space, and about 4,700 square feet of light industrial space. The new building at 2125 Bryant Street would contain about 113,500 square feet of office space compared to about 109,200 square feet with the main alternative and about 114,550 square feet with the project. The new building at 700 York Street would contain about 4,100 square feet of office space compared to about 2,050 square feet of office with the main alternative. The addition to the 2101 Bryant Street building would be about 6,000 square feet for the variant compared to 4,800 square feet for the main alternative. Like the proposed project, this variant would not comply with bulk limits on the project block.

“In the Increased Parking Variant, the underground parking garage would provide the same three-level underground parking garage accommodating 260 independently-accessible spaces, as described in the main alternative. By operating the entire garage on an attendant basis, the variant would supply 339 valet spaces, an increase of 33 valet-assisted spaces over the main alternative.”

“Impacts

“Land use impacts would be the same for this alternative and its variant as for the project, however the intensity of development, except for parking, would be somewhat less. Views of the site would be similar to views of the project although this alternative would be slightly smaller. This alternative would be about the same height and bulk as the proposed project. The alternative would not require a bulk exception while its variant and the project would. The variant, although requiring a bulk exception, would appear less bulky at the corner of Bryant and 19th Streets where a relatively large three-story corner element has been added. The alternative would develop this corner to the maximum allowable bulk which would be four-stories tall across the lot.



Existing Views from Bryant Street and 20th Street



Visual Simulation of the Increased Parking Variant to the Parking-Demand Compliant Alternative

SOURCE: Environmental Vision, 2000; PFAU Architects, 2000.

Bryant Square Project

Figure C&R.1: View and Simulation from Corner
of York Street and 19th Street

Maxwell &
Associates

“Impacts on the historic building would be the same for the alternative or its variant as with the less-than-significant historic structure effects of the project.

“This alternative would provide adequate parking to meet parking demand on site in independently accessible parking spaces compared to valet operations with the project. ~~and a 24 space parking shortfall.~~ However, valet-assisted parking would be used to meet the additional demand from the 720 York Street building. The Increased Parking Variant would supply surplus parking to meet demand through provision of 339 valet-assisted parking spaces.

“Site circulation would be the same for this alternative as for the project.

“This alternative would provide parking for parking demand on site in independently accessible parking spaces compared to valet operations with the project. ~~and a 24 space parking shortfall.~~ However, valet assisted parking would be used to meet the additional demand from the 720 York Street building. The Increased Parking Variant would supply surplus parking to meet demand through provision of 339 valet-assisted parking spaces.

“The Parking-Demand Compliant Alternative would have a parking code requirement of 253 spaces and a parking demand of 254 spaces. When comparing the amount of parking demand for this alternative and 720 York Street development to independently-accessible spaces, the parking shortfall is 39 spaces, if 45 spaces are allocated to 720 York Street. When the total parking supply of 306 spaces, as expanded through valet operations, is compared to the parking requirement, an excess of seven parking spaces would be provided, if 45 spaces were allocated to the 720 York Street project. The Increased Parking Variant would generate a parking demand of 235 spaces. With 339 parking spaces provided on a valet basis, even after allocating 45 spaces to the 720 York Street building, the variant would proved a surplus of 86 spaces above demand.

“This alternative would generate about 2,516 daily trips compared to about 3,324 for the project. A total of about 180 p.m. peak hour trips would occur with this alternative compared to 218 for the project. During the p.m. peak hour 122 automobile trips, 32 transit trips, 20 pedestrian trips, and about six bicycle trips would occur to/from the project site

with this alternative, compared to 148 automobile trips, 39 transit trips, 24 pedestrian trips, and seven bicycle trips for the project. Total trips from the variant would be less (2,463 trips compared to 2,516 trips with the main alternative) due to a decrease in retail uses on site. As with the project, this alternative would contribute to significant cumulative traffic increases at the 23rd Street and Potrero Avenue intersection in 2010, which would be reduced to a less-than-significant level by implementing the mitigation measures identified in the EIR.

“Less-than-significant temporary construction noise, traffic and air quality impacts would occur on the Bryant Square site although the duration of impacts would be expected to be greater for this alternative than for the project due to excavation and construction of a third underground parking level. The same number of temporary construction jobs for building the project would be expected for this alternative.

“No significant impacts that could not be avoided would occur due to operation of either this alternative or the project on the following other topics: population, noise, air quality and wind, public services and utilities, biology, water, hazardous materials, energy, geology, seismicity and soils, archaeological resources, and growth inducing effects.

“Project Sponsors’ Acceptance of Alternative”

“This alternative would be generally consistent with the project sponsor’s objectives. The project sponsor is now proposing the Increased Parking Variant, although the variant would provide a reduced amount of modern office space for the information technology industry and would provide fewer jobs on site than the proposed project.”

